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Latter-day Saints*

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

MCKENNA DENSON,  
  
Plaintiff,

v.

CORPORATION OF THE  
PRESIDENT OF THE CHURCH  
OF JESUS CHRIST OF LATTER-  
DAY SAINTS, a Utah corporation;  
and JOSEPH L. BISHOP,

Defendants.

**SHORT FORM MOTION TO  
COMPEL**

Case No. 2:18-cv-00284

The Honorable Dale A. Kimball

**ORAL ARGUMENT REQUESTED**

Defendant Corporation of the President of The Church of Jesus Christ of Latter-day Saints (“COP”) requests that the Court order Plaintiff McKenna Denson to respond to outstanding discovery requests and produce requested documents.

Ms. Denson’s discovery responses are deficient in at least three respects. First, Ms. Denson has not provided *any* responses to COP’s Second Set of Discovery Requests. COP propounded its second set of discovery requests on

March 14, 2019. Ms. Denson's responses were due on April 15, 2019. To date, COP has not received any responses from Ms. Denson.

Second, Ms. Denson's productions and responses to interrogatories are incomplete and inconsistent with her deposition testimony. For example, Ms. Denson testified that she is writing a book about her allegations and this case. She produced only a single page "outline" and, when pressed, she indicated that was all she had written. Just a few days later, however, Ms. Denson posted on social media that her book is "nearly complete." Similarly, she indicated in response to an interrogatory that she does not have a reddit account. Yet a simple search reveals at least one account owned by a "McKenna Denson" that frequently posts about her case. And she has not produced the notes of conversations she testified to having at home in her desk or documents related to many other legal cases in which she has been involved. There are also multiple requests (detailed in COP's Discovery Dispute Table) to which Ms. Denson responded by agreeing to produce documents but has failed to do so. For example, Ms. Denson has not produced document related to her recent criminal case.

Finally, none of her productions comply with this Court's order. She is required by that order to produce documents via "load files" that are suitable for upload into document databases like Casepoint. Yet none of her productions have

done so. She has produced a non-unitized PDF without metadata as well as thousands of screenshots (most of which are non-responsive) with no bates-stamps or load files. Without metadata, load files, or bates stamps the documents are nearly impossible to review or search.

COP also requests that the discovery deadline be extended to accommodate additional discovery. After receipt of Ms. Denson's documents, COP intends to take additional depositions and subpoena other third-party documents in this matter.

Consistent with the Court's prior practice in this case, COP attaches a table detailing the discovery disputes individually.

DATED: May 21, 2019.

STOEL RIVES LLP

/s/ David J. Jordan

David J. Jordan

Wesley F. Harward

*Attorneys for Defendant Corporation of  
the President of The Church of Jesus  
Christ of Latter-day Saints*

# Exhibit 1

**COP's Discovery Requests:**

<b>Discovery Request</b>	<b>COP's Position</b>	<b>Proposed Resolution</b>
Interrogatory No. 2: Identify all social media accounts You control, including but not limited to Your Twitter handle(s), reddit username(s), Facebook profile(s), and podcast username(s).	Ms. Denson responded that she “does not have a Reddit username, nor does she have any podcast usernames.” But a simple search reveals that there is a reddit account under Ms. Denson’s name that posts information about Ms. Denson’s case. An example of such a post is attached as Exhibit A.	Ms. Denson should revise her responses and produce documents from this account.
Interrogatory No. 7: Identify every electronic device or cloud-based account capable of storing Documents that you own or use, or have owned or have used from November 2017 to present, including but not limited to, personal computers, tablets, smartphones, and data storage devices.	COP propounded this Interrogatory on March 14, 2019. Ms. Denson’s response was due on April 15, 2019. To date, Ms. Denson has not responded.	Require Ms. Denson to respond to the interrogatory and deem any objection waived.
Interrogatory No. 8: Identify by email address every email account you have owned or used.	COP propounded this Interrogatory on March 14, 2019. Ms. Denson’s response was due on April 15, 2019. To date, Ms. Denson has not responded.	Require Ms. Denson to respond to the interrogatory and deem any objection waived.
Interrogatory No. 9: Describe in detail your efforts to collect documents for the purpose of responding to discovery requests in this case. This description should include an identification of every electronic storage device or account searched, the method and criteria used for any search, the	COP propounded this Interrogatory on March 14, 2019. Ms. Denson’s response was due on April 15, 2019. To date, Ms. Denson has not responded.	Require Ms. Denson to respond to the interrogatory and deem any objection waived.

method of collection, and identification of all hard-copy files searched.		
All Requests for Production Generally	<p>Ms. Denson has not produced a single document in accordance with the Court's Stipulated Scheduling Order (Docket 32). That order requires that "[a]ll documents will be produced in jpg, single-page tiff load files or other formats, suitable for being downloaded into CasePoint, Relativity, Concordance, Summation or other document management systems to be specified by counsel." Contrary to this order, Ms. Denson's first production was in the form of a single PDF document. Both the PDF format and the non-unitized nature of that production violate the order. Similarly, Ms. Denson's second production was a thumb-drive containing hundreds of .htm files appearing to be screenshots of Facebook pages. There was no load file. The documents have no bates stamp. And the documents do not include any of the metadata required to be "suitable for being downloaded into CasePoint."</p>	Ms. Denson should be required to produce documents in the court-ordered format.
Missing Documents Responsive to Multiple Requests	<p><b>Emails:</b> Ms. Denson has not produced any of her emails. She has, however, indicated that she has regularly communicated with reporters and many others about her case.</p> <p><b>Private Facebook Messages:</b> Ms. Denson testified in her deposition that she has used private Facebook messages to communicate with</p>	Ms. Denson should be required to do a complete search of her documents and communications. This would include, at a minimum, hiring a vendor to collect digital data from all electronic and cloud-based storage devices (including cell phones and social media accounts), proposing an

	<p>individuals about her case. <i>See, e.g.,</i> Denson Dep. 211-12 (excerpts attached as Exhibit B). Ms. Denson has produced some redacted copies of private messages (without load files). There is no legal basis on which Ms. Denson may redact the documents.</p> <p><b>Notes of Conversations:</b> Ms. Denson testified multiple times about notes that she keeps in her “secretary” desk. For example she testified she has notes about her conversations with Carmen Preece. <i>Id.</i> at 214-15. Similarly, she testified that she wrote notes about “Ted” that are in her secretary desk. <i>Id.</i> at 333-34. None of these notes have been produced.</p> <p><b>Drafts of Book:</b> Ms. Denson testified that she is writing a book. She stated “it’s a journal. It’s keeping track of everything that happens and who does what and who says what.” <i>Id.</i> at 189. And she confirmed that she is “writing it like a book as if it’s something that would be published.” Ms. Denson has not produced any drafts of a book or journal matching the deposition testimony. Instead, she produced a single page outline. Counsel for Ms. Denson represented that this outline was the only thing Ms. Denson had written. Days later, Ms. Denson posted on Facebook that the “[f]irst draft] of the book was “nearly completed” and asked for donations to her PayPal and Venmo accounts. Attached as Exhibit C.</p>	<p>agreeable list of search terms to run against the information collected, and then producing any responsive documents. The documents should not be improperly redacted.</p>
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	<p><b>Text Messages:</b> Ms. Denson's single-document PDF included some screenshots of text conversations with Ryan McKnight and Lori-Draper Smith. Attached as Exhibit D. Those are clearly incomplete and do not supply any metadata. Ms. Denson has not produced any other text messages.</p> <p><b>Video Files:</b> Ms. Denson has not produced any video files. Ms. Denson, together with Michael Norton and others, recorded Ms. Denson addressing Mr. Bishop's local congregation during worship services. Ms. Denson and others posted that video, in various edited forms, online. All of the footage (edited and unedited) is responsive to multiple requests. A copy of one of the edited videos is attached as Exhibit E.</p> <p><b>Reddit Posts:</b> As discussed above, Ms. Denson has a reddit account on which she posts information about her case. She has never produced any documents including public or private posts/messages from this account.</p>	
RFP No. 11: All Documents or Communications regarding any lawsuit, threatened lawsuit, or claim in which You have been involved, including but not limited to Your prior lawsuits or claims against: PF Chang's China Bistro, United Food Service, Balboa Dessert Company, McDonald's, Heavenly Ham,	Ms. Denson has not produced any documents in response to this request. There are certainly responsive documents in her control via her attorneys.	Ms. Denson should produce documents responsive to this request.



California Dreaming, Franklin Life Insurance, Winslow BMW, Body Works Tanning Salon, Michael Reyes, James P. Smith, David Midkiff, Edward Tagge, Michael Hamrick, James Robinson, or Ronnie Smith.		
RFP No. 19: All Documents or Communications regarding Your past criminal convictions or criminal charges.	Ms. Denson has not produced any documents in response to this request. There are certainly responsive documents in her control as she has had recent criminal charges in Colorado.	Ms. Denson should produce documents responsive to this request.
RFP No. 27: All Documents, regarding or Communications with Ryan McKnight, Ethan Dodge, Ethan Krok, MormonLeaks, or the Truth and Transparency Foundation relating to the subject matter of this case, Mr. Bishop, COP, or The Church of Jesus Christ of Latter-day Saints.	COP propounded this Interrogatory on March 14, 2019. Ms. Denson's response was due on April 15, 2019. To date, Ms. Denson has not responded.	Require Ms. Denson to respond to the interrogatory and deem any objection waived.
RFP No. 28: All Documents regarding or Communications with Michael Norton relating to the subject matter of this case, Mr. Bishop, COP, or The Church of Jesus Christ of Latter-day Saints.	COP propounded this Interrogatory on March 14, 2019. Ms. Denson's response was due on April 15, 2019. To date, Ms. Denson has not responded.	Require Ms. Denson to respond to the interrogatory and deem any objection waived.

## EXHIBIT A

comments

Meme filter: Normal | Hide | Only

## Welcome to Reddit.

Come for the cats, stay for the empathy.

[BECOME A REDDITOR](#) and start exploring.

222

McKenna Denson ~ A price on my head? A hit list? Received word that this is the case. Been warned to take extreme caution. All I know is my story will be told ... with or without me. ☺

(self.exmormon)

submitted 29 days ago by McKenna-Denson

61 comments share save hide report

x

search

S

this post was submitted on 26 Mar 2019

**222 points** (88% upvoted)shortlink: <https://redd.it/b5ic>

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1,511 users here now

A forum for ex-mormons and others who have been affected by mormonism to share news,

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sorted by: **best**

**Want to add to the discussion?**

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[–] **ForElzadia** 63 points 29 days ago

I'm so sorry! What is going on?

[permalink](#) [embed](#) [save](#) [report](#) [reply](#)

[load more comments](#) (8 replies)

[+] **[deleted]** 29 days ago (3 children)

[–] **beerformytapir** 48 points 29 days ago

So sorry to hear this. If it's a credible threat, get the police involved and make sure you and your family are safe.

[permalink](#) [embed](#) [save](#) [report](#) [reply](#)

[–] **McKenna-Denson** [S] 12 points 29 days ago

Thank you. Whether legit or scare tactic I take every threat very seriously. I post about them so people are aware. Reports are made and posts are made.

[permalink](#) [save](#) [parent](#) [report](#) [reply](#)

[–] **minininjatriforceman** I hate humans other than my wife. 21 points 29 days ago

I hope you and your family are able to stay safe. I personally have really admired your courage and resolve.

[permalink](#) [embed](#) [save](#) [report](#) [reply](#)

[–] **goforth2** 25 points 29 days ago

I hope you made a police report.

[permalink](#) [embed](#) [save](#) [report](#) [reply](#)

[–] **handbook\_1** 3 points 29 days ago

Back in the TBM days...bishop would tell you to keep stuff like this "in house"

[permalink](#) [embed](#) [save](#) [parent](#) [report](#) [reply](#)

[–] **imnowfreebutalone** 22 points 29 days ago

If this is legitimate you need to call the FBI, as this is tied to a hate crime, especially if you received the threat via email, social media or via phone. This exceeds the local police authority to investigate.

[permalink](#) [embed](#) [save](#) [report](#) [reply](#)

[–] **McKenna-Denson** [S] 8 points 29 days ago

Done

commentary, and comedy about the Mormon church.

[OPEN](#)

## Subreddit Rules

### 1. All posts must be related to Mormonism

Please keep all posts related to Mormonism. Politics, news, science, and memes are allowed if related to Mormonism.

### 2. No doxxing / revealing personal information

Please do not post names, phone numbers, addresses, or personally identifying information. Do not link to social media accounts. Linking to professionally published news articles is not doxxing.

### 3. No personal attacks or trolling

Please do not engage in personal attacks or trolling. Disagreement is fine, but stay civil. Do not intentionally try to provoke a negative reaction out of someone.

### 4. No harassment

Please do not harass other users. Do not debate victims of sexual assault or people who are feeling suicidal – they just want a friendly ear. Do not encourage self-harm, denial of the problem, victim blaming, concern-trolling, or edgy/dark humor about these topics. Do not sexually harass when people post selfies.

### 5. No fundraising or advertising

Please do not advertise fundraisers, or advertise products, goods, or services. [/r/ExNetwork](#) has been created exclusively for content creators. This allows the subreddit to stay free of advertising, and avoid seeing disagreements between vendors and consumers.

### 6. No brigading or drama

Please do not engage in brigades against other subreddits. Do not bring drama from other subreddits. Do not brag about getting banned on another subreddit. Always use non-participation links when linking elsewhere on reddit ([np.reddit.com/r/\\_\\_\\_\\_\\_](#)).

### 7. No NSFW images or links

Please do not post NSFW images or links to NSFW sites. This helps us keep a positive, inclusive atmosphere.

[QuitMormon.com](#)

[Tapir Signal](#)



[permalink](#) [embed](#) [save](#) [parent](#) [report](#) [reply](#)

[–] [isInddance1](#) 27 points 29 days ago

Oh I'm so sorry. Mormons threatening violence certainly is another bad reflection on them, but you should not have to endure this. ☹

[permalink](#) [embed](#) [save](#) [report](#) [reply](#)

[–] [truth-wins](#) 24 points 29 days ago

Tell the police ASAP, and make sure that message gets to whoever heard this. Hopefully just rumor, but be careful. There are a lot of crazies out there.

[permalink](#) [embed](#) [save](#) [report](#) [reply](#)

[–] [McKenna-Denson](#) [S] 4 points 29 days ago

Done. Thank you

[permalink](#) [embed](#) [save](#) [parent](#) [report](#) [reply](#)

[–] [purposeinmeaning](#) 16 points 29 days ago\*

Open none of your doors to men who call themselves John D Lee or represent McConkie.

[permalink](#) [embed](#) [save](#) [report](#) [reply](#)

[–] [ReturnedAndReported](#) Happostate 46 points 29 days ago

In the past 5-6 years I've been on this sub, I've seen quite a few bullshit claims. Some had a kernel of truth but turned out to be overinflated.

McKenna...Extraordinary claims require at least some evidence. Between this and begging for money on FB, you're losing credibility.

[permalink](#) [embed](#) [save](#) [report](#) [reply](#)

[–] [idkmybffjesus](#) 11 points 29 days ago

She begged for money?

[permalink](#) [embed](#) [save](#) [parent](#) [report](#) [reply](#)

[–] [ReturnedAndReported](#) Happostate 3 points 29 days ago

Yes. She would post her bank account balance and ask for money.

[permalink](#) [embed](#) [save](#) [parent](#) [report](#) [reply](#)

[–] [idkmybffjesus](#) 6 points 29 days ago

Yikes.

[permalink](#) [embed](#) [save](#) [parent](#) [report](#) [reply](#)

[–] [CanMormNoMore](#) 1 point 27 days ago

If you gave money to Mormonism, surely you can give money to a woman asking for help? You don't need to believe her to decide to give her money. Do you judge the homeless person before you hand them some cash? Do you withhold your taxes because you think the government might misuse it?

She simply asked for support, she didn't demand it or coerce anyone into giving it.

Read our [Exit Stories](#)  
from Mormonism

Read our [FAQs](#)

[Official /r/exmormon Chat](#)

[Life After  
Mormonism  
Chat](#)

Resource Pages:

- [Resigning: How To](#)
- [Suicide Awareness and Support](#)
- [Physical & Mental Health Support / Warning to current BYU students](#)
- [Child Sex Abuse Hotline: 801-215-9748](#)
- [Resources For Disbelieving Missionaries](#)
- [Apologetic Essays](#)
- [Common sources and book recommendations](#)
- [More links to other resources at the wiki](#)

## - Common Abbreviations -

Related Reddits:

- [/r/exmoteens](#)
- [/r/exmo\\_selfies](#)
- [/r/MixedFaithLove](#)
- [/r/bestof\\_exmormon](#)
- [/r/Exmo\\_Women](#)
- [/r/kolob](#)
- [/r/postmormon](#)
- [/r/exSistersInZion](#)
- [/r/MormonLibre](#)
- [/r/exmormonportugues](#)
- [/r/Exmormonen](#)
- [/r/exmo4exmo](#)
- [/r/exrm](#)
- [/r/Exittors](#)
- [Ex-\(other religions\)](#)
- [/r/mormon](#)
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- [/r/SaltLakeCity](#)
- [/r/LGBT\\_Mormons](#)
- [/r/Exmo\\_Spirituality](#)
- [West Ridge Academy Alumni](#)
- [more related links and policy info](#)

## Emeritus Mods Listing

created by [Measure76](#) [emeritus founder](#)

permalink embed save parent report reply

[–] [idkmybffjesus](#) 1 point 27 days ago

I gave money to Mormonism and learned not to give money just because someone is asking.

permalink embed save parent report reply

[–] [CanMormNoMore](#) 1 point 27 days ago

I gave money to Mormonism too. I learned that I can give money to whomever I damned well choose and that money can't buy salvation or redemption, but it can ease the burdens of those in need.

permalink embed save parent report reply

[–] [Yobispo](#) 10 points 29 days ago

I love her guts and hope for her success, but, umm, yeah.

permalink embed save parent report reply

[–] [finitefires](#) 5 points 29 days ago

I'm leaning this way too. I mean, what can we do to protect her against a vague threat? Will my post stop a bullet? Will her non-clue lead us to real evidence? Her situation sucks, and I am sorry for her personal tragedies.

permalink embed save parent report reply

[–] [McKenna-Denson](#) [S] 11 points 29 days ago

When I was followed last year and then a man came to my door I posted it on my Facebook page. Wasn't bothered for nearly a year. I'm not asking for help I'm giving notice that I've been threatened. You can't physically help me but you send positive thoughts this direction.

permalink embed save parent report reply

[–] [alaskamamma](#) 4 points 29 days ago

I believe you McKenna and I am not bothered in the least that you are asking for financial help. Much Love!

permalink embed save parent report reply

[–] [Spongeopolis](#) 4 points 29 days ago

I have verified that this account is indeed the victim of Joseph Bishop. No disrespect to McKenna, but she's not as tech savvy as many of us veterans of the Wild West Internet. Give her time since she's states that she's making a police report. Victims of abuse getting death threats is nothing new. It's just surprising that these threats are still happening to this day so long after the initial news broke.

permalink embed save parent report reply

[–] [Word2daWise](#) I'll see your "revelation" and raise you a resignation. 15 points 29 days ago

a community for 9 years



**MESSAGE THE MODERATORS**

#### MODERATORS

[canadianjohnson](#) [Eliakim the Scribe](#)

[EmmaHS](#)

[AnotherClosetAtheist](#)

★★★★ [General in the War in Heaven](#)

★★★★

[vh65](#) Addicted to Truth & Tea

[subversiveasset](#)

the entropic endstate of mormon

navelgazing

[daveescaped](#) Jesus is coming. Look busy.

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X

1007 · 75 comments



[My sister on learning about polygamy in seminary... looks like her shelf is getting heavy](#)



What sort of thing were you told? Do you think it was worded in a way that doesn't quite mean what it sounds like, but might mean they want to shut you up and get you off their radar in some way?

Stay safe, and stay brave.

permalink embed save report reply

[–] **McKenna-Denson** [S] 3 points 29 days ago

Exposing the threat keeps me safe.

permalink embed save parent report reply

[–] **oberon** 14 points 29 days ago

Sorry, who are you, and why are you telling us this? The correct response to a threat on your life is to inform law enforcement, not to make a suggestive Reddit post with zero actual information and a wink emoji.

permalink embed save report reply

[–] **bearcheese** 1 point 29 days ago

I googled: <https://www.slttrib.com/news/2018/09/04/woman-who-accused-former/>

permalink embed save parent report reply

[–] **unpopularopinionexmo** 25 points 29 days ago

Oooh...unverified rumors. My favorite! ☐

permalink embed save report reply

[–] **Henry\_B\_Irate** 4 points 29 days ago

At least with the recording we could verify. But this smacks of trying to drum up sympathy.

permalink embed save parent report reply

[–] **LauraBlevins** 10 points 29 days ago

If you need to come stay in another state far far away from Utah, my home is open to you! Please be safe!!!

permalink embed save report reply

[–] **McKenna-Denson** [S] 3 points 29 days ago

Thank you. People know now. I think that keeps me safe.

permalink embed save parent report reply

[–] **bigironside** 12 points 29 days ago

This pissed me off, you need help please just ask.

permalink embed save report reply

[–] **McKenna-Denson** [S] 2 points 29 days ago

You can't help. Just send positive thoughts my way. By exposing the threat it becomes less threatening.

permalink embed save parent report reply

[–] **PM-ME-RABBIT-HOLES** uncloseted Apr 2019! 2 points 29 days ago

I think people here have to know what you're talking about for that to work

permalink embed save parent report reply

[–] **georgeorwellsmother** 3 points 29 days ago

?

permalink embed save report reply

[–] **NoOneKnew2019** 7 points 29 days ago\*

Utahcide- it's very dangerous and often fatal. Thought to be very contagious. Has been known to affect nearby states. Don't let it happen to you!! Be safe!

permalink embed save report reply

[–] **McKenna-Denson** [S] 2 points 29 days ago



permalink embed save parent report reply

[–] **Spongeopolis** 5 points 29 days ago

It's just like the whistling and whittling gang in Nauvoo. Whenever the a critic of the Church (often other Illinoisans) moved into town. A group of young men (usually unruly teenagers) would follow the person around town whistling and whittling branches with big bowie knives until the individual got the message. Many people fled Nauvoo after the immigration of the Mormons because the new occupants had no tolerance for change.

permalink embed save report reply

[–] **FHL88Work** Many are cold, but few are frozen 2 points 28 days ago

Sam Young had a nutjob threaten him and his family. Too many crazies out there.

[/u/invisibles\\_cubit](#) : anything ever come of that?

permalink embed save report reply

[–] **Invisibles\_Cubit** 2 points 28 days ago

Nope. I report 2 separate incidents to the Sugar Land Police. Both times with the same result. They did not have the technical resources to identify the threatening parties. I would have to go to the FBI as they would have the proper tools for a complete investigation. I didn't take it any further. However, the threats ended. Taking the matter to the police at least sent a message.

permalink embed save parent report reply

[–] **deviltakeitall** 4 points 29 days ago

Wow that is insane!

permalink embed save report reply

[–] **[deleted]** 3 points 29 days ago

I hope you are okay.

permalink embed save report reply

[–] **McKenna-Denson** [S] 1 point 29 days ago

I feel safer knowing it's public. Thank you.

permalink embed save parent report reply

[–] **bikesnguns** 1 point 29 days ago

Thoughts go out to you, hope you're safe!

permalink embed save report reply

[–] **fake666account** 1 point 29 days ago

<https://www.reddit.com/r/exmormon/comments/ar7bft/comment/egljkm>

permalink embed save report reply

[–] **1Searchfortruth** 2 points 29 days ago

Don't listen to the jerks who discount you

You have heard from plenty of them

You have to take every threat serious and tell the FBI find someone who will take action

permalink embed save report reply

[–] **McKenna-Denson** [S] 1 point 29 days ago

Done

permalink embed save parent report reply

[–] **1Searchfortruth** 2 points 29 days ago

That's my girl!! You know you are my hero. You have so much courage



Stay safe. We need hero's like you



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[~] [BaedoApostate](#) -4 points 29 days ago

SLC should beware. Ever heard of a latter-day mob? It's called a riot. (like St. Louis, Philadelphia, Charlotte, Berkeley... need I go on?)

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## **EXHIBIT B**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

MCKENNA DENSON,

Plaintiff,

vs.

2:18-cv-00284

CORPORATION OF THE PRESIDENT  
OF THE CHURCH OF JESUS CHRIST  
OF LATTER-DAY SAINTS, a Utah  
corporation; and JOSEPH L.  
BISHOP,

Defendants.

Case No.:

The Honorable  
Dale A. Kimball

VIDEOTAPED DEPOSITION OF MCKENNA DENSON  
Thursday, October 4, 2018

- - -

NATIONAL COURT REPORTERS, INC.

888.800.9656

- - -

1 A. I have it written down somewhere. I  
2 don't know it off the top of my head, no.

3 Q. Written down where?

4 A. Probably at home in my -- in my  
5 secretary.

6 Q. Do you keep a journal of these things?

7 A. Sort of. I'm writing a book. Yes.

8 Q. You're writing a book?

9 A. Uh-huh.

10 Q. For what purpose?

11 A. Because it's all very interesting to me.

12 Q. Any other purpose for which you're  
13 writing a book other than it's interesting to you?

14 A. Well, it's a journal. It's keeping track  
15 of everything that happens and who does what and who  
16 says what, uh-huh.

17 Q. No, I understand what you're saying, but  
18 that's different than writing a book. A book is  
19 something -- a journal may be someone's private  
20 recording. A book is something that someone intends to  
21 publish more broadly.

22 A. I don't have any intention of doing  
23 anything with it right now.

24 Q. Well, but you're writing it like a  
25 book --

1     that Joseph Bishop had given her, being Carol Hobbs,  
2     Sister Hobbs, sleeping pills.

3     Q.     You're saying not arranged for her to get  
4     them from some physician or pharmacy. Gave them to  
5     him -- gave them to her himself?

6     A.     That was my understanding --

7     Q.     Uh-huh.

8     A.     -- but I don't know for sure. I don't  
9     know.

10    Q.     That was the impression you had from your  
11    conversation?

12    A.     That was the impression, I had. Yes.

13    Q.     And --

14    A.     And she thought it was very strange that  
15    her companion was suddenly very depressed and that the  
16    MTC president was giving her sleeping pills. And with  
17    his behavior toward me, and most other people don't know  
18    about the others, she thought it was something we needed  
19    to look into, a potential victim.

20    Q.     And what did you do to follow up on that  
21    information?

22    A.     I haven't yet. This is recent.

23    Q.     How recent?

24    A.     A couple weeks.

25    Q.     Where does Laurie Smith live?

1 A. I don't know.

2 Q. How did you come into contact with her?

3 A. She reached out to me.

4 Q. In social media?

5 A. Uh-huh.

6 Q. By direct message?

7 A. Private message, I believe.

8 Q. Facebook?

9 A. Yes.

10 Q. You would still have her communication?

11 A. Yes.

12 Q. Is there anything else she told you?

13 A. No.

14 Q. Did she report that she'd had any  
15 negative experience of her own with Joseph Bishop?

16 A. No. In fact, she had none.

17 Q. No negative experience?

18 A. No experience with him.

19 Q. She had no communication with him at all?

20 A. That was my understanding.

21 Q. Anyone else who you believe may have been  
22 a victim of Joseph Bishop, whether it's direct knowledge  
23 or something that you have secondhand?

24 A. I've heard of a sister missionary in  
25 Argentina that started out her mission really happy,



1 Carmen Preece?

2 A. Yes.

3 Q. And she has told you that she served in  
4 Argentina with a sister missionary with whom she was  
5 companions twice?

6 A. Yes.

7 Q. And the first time that she served with  
8 her companion, she was a happy, positive missionary?

9 A. Yes.

10 Q. And the second time she served with her  
11 companion several months later, she was an angry and  
12 depressed companion?

13 A. Yes. And she could not even stand to  
14 hear Joseph Bishop's name.

15 Q. What is the name of this missionary?

16 A. I don't know. It's in my -- I have it at  
17 home.

18 Q. In your --

19 A. Secretary.

20 Q. In the notes of the book that you're  
21 writing?

22 A. Yes.

23 Q. Is it Ana Miriam Morales?

24 A. That is one of the names.

25 Q. I'm asking you if that is the name of the

1 former companion of Carmen Preece's.

2 A. I can't remember which is which, who is  
3 who, what name goes with which story. I don't know if  
4 she was the one that was taken over by evil spirits or  
5 maybe she was the one that would no longer even tolerate  
6 listening to Joseph Bishop's name. I don't know which  
7 one she is. But, yes, she is one of -- she -- her name,  
8 yes, is one of the women. Uh-huh.

9 Q. Let me ask you this way. Is the name of  
10 the woman that you're not recalling right now that you  
11 have at home in the draft of your book, is that woman's  
12 name disclosed in the initial disclosure of witnesses  
13 that your lawyer has filed?

14 A. I don't know. I think it is, but let's  
15 see what names you have.

16 Q. I'll read the list to you and see if you  
17 can pick it out.

18 A. Go ahead. Uh-huh.

19 Q. All right. It's obviously not any of the  
20 men; so I'll pass over them. The first woman who  
21 appears on the list is Elesha Denson. That's Todd  
22 Denson's current wife.

23 A. Uh-huh.

24 Q. So obviously it's not her, right?  
25 There's a woman here named Jan Tyler?



1 a young man and a young woman."

2 Q. And you have now come to believe that Ted  
3 was not a credible witness?

4 A. I don't know if he was credible or not.  
5 I consider him -- oh, excuse me. I consider him not  
6 credible because he wasn't willing to come forward. He  
7 wasn't willing to testify.

8 Q. How do you know he wasn't willing to  
9 testify?

10 A. The intermediary.

11 Q. Did you write about Ted in your draft of  
12 your book?

13 A. I wrote about Ted. It's not in the draft  
14 of my book.

15 Q. Where is it?

16 A. In my secretary.

17 Q. And in what form is it?

18 A. Notes.

19 Q. Notes of your phone call?

20 A. Yes.

21 Q. So when you were either talking on the  
22 phone or immediately thereafter, you recorded what you  
23 were told?

24 A. I did.

25 Q. And those notes are still in your

1 secretary?

2 A. Uh-huh. Yeah. I was really excited,  
3 because I knew that I had met with Elder Asay and I had  
4 watched the news program with Chris Jones where Ron  
5 Leavitt says that he didn't escalate anything and didn't  
6 tell anyone. And here was somebody that was going to  
7 come forward. Yeah. I was pretty excited.

8 Q. Have you had any communication with Ron  
9 Leavitt since you were in his ward as a young woman?

10 A. Yes.

11 Q. When did you last speak with him?

12 A. When did I last speak with him. Crikey.  
13 I don't know, but I can tell you this. Ron Leavitt  
14 arranged for me to meet with Elder Asay. Ron Leavitt  
15 attended my temple wedding in Manti. Ron Leavitt sent  
16 his daughter, Tammy, to live with me in Taiwan for a  
17 summer. He sent me Demerol through the mail when I was  
18 pregnant because we had moved a couple hours away from  
19 the hospital. When I would come back for visa trips, I  
20 would come to Utah and visit him and his wife.

21 Q. From Taiwan?

22 A. Uh-huh.

23 Q. Okay. Since then, since the time that  
24 you and Todd were relatively newly married, have you had  
25 any contact with Ron Leavitt?

## EXHIBIT C



**McKenna Denson**

20 hrs · 🌐

...

### "The Rape Room"

First draft nearly completed. Now comes the hard work. Editing. Making it comprehensive and easy to read. We all know the stories of sexual and ecclesiastical abuse are hard to get through. The difficulty is relaying the story without creating new trauma for the reader.

It's more than a full time job and as [Sam Young](#) has stated, "not as romantic as one would think."

If you are able I would really appreciate any financial support you can offer. There have been "intended consequences" that have been thrust on me. They will be exposed soon. These intentional attempts to silence me have not and will not work.

PayPal

McKenna Denson

mckenna.aitcounseling@gmail.com

Venmo

McKenna-Denson

McKenna.aitcounseling@gmail.com



Sam Young and 83 others

18 Comments 12 Shares



Like



Comment



Share



**Tom Stollings** You can do it. You are strong.

Like · Reply · 20h



3

 4

Like · Reply · 19h

 4

Like · Reply · 18h · Edited





Katie McKenzie So proud of you. ❤️

Like · Reply · 18h



Kerry Anne Sheehan



Like · Reply · 17h





**Kerry Anne Sheehan**



Like · Reply · 17h



**Angela Marie Singh** You inspire me! ❤️

Like · Reply · 17h



**Ashley Kaapuni** You're amazing. If you need help editing I'm happy to help in whatever ways possible. Financially I am hoping we keep the roof over our heads this month so I can't offer much there. But any other help, I'd be more than grateful for the opportunity. ❤️❤️

Like · Reply · 17h





**McKenna Denson** Ashley Kaapuni thank you. ❤️

Like · Reply · 17h



**Sandra Daniels Magda** You've got this!!

Like · Reply · 17h



**Ashley Sears Moody** You are incredible **McKenna**! A beacon of light and hope for so many!

Like · Reply · 16h



**Christie Beecher** I hope it does show the trauma, so many of us have been in situations that we our selves rationalize for years; because surely that didn't just happen 🤔💜

And then we feel hallowed out for decades.

It would be brutally traumatizing when your vision of god/power rapes you!

I'm so sorry

Like · Reply · 13h



**Karmyn Kunze Swan** Thank you for your bravery and integrity!

Like · Reply · 4h

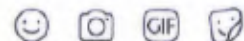


**Diamond Melodi McKenna** U R the Mormon ....(aka The Church of Jesus Christ of Latter-day Saints aka **#Mormon\***) .... equivalent of Leah Remini. Scientology has tried to discredit her many times. She usually has already beat them to it, with a 'so what? I ain't perfect,' a lot like you. Lol. I'm waiting for the human who usually comes on about now to tell us of your 'mistakes', in order to invalidate you. Maybe she gave up. Thanks for being brave and facing people like her, and even worse people, sent to bring you down. There's no sugar coating how awful that feels. **#bravegirl**  
\*aw snap!, that name just won't go away!!

Like · Reply · 1h · Edited

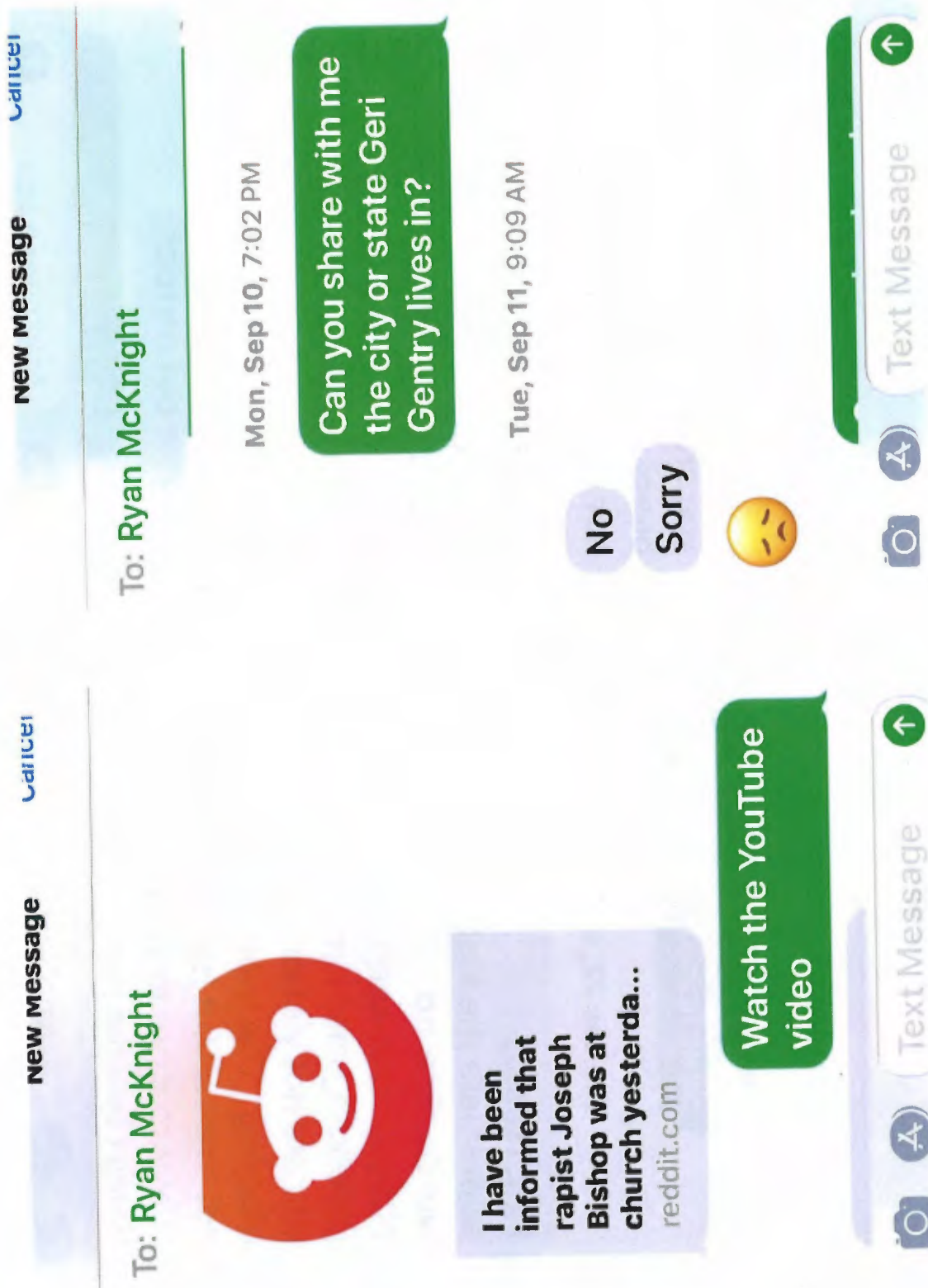


Write a comment...





## EXHIBIT D



new message

Cancel

To: Ryan McKnight

Can you lead me in any direction?

Sat, Sep 22, 5:18 PM

Hey, I totally appreciate the kinds words. Feel no obligation to keep defending me. I know you are not victim blaming. The topic is not even about her and I have told her tons of times I believe her



Text Message



new message

Cancel

To: Ryan McKnight

defending me. I know you are not victim blaming. The topic is not even about her and I have told her tons of times I believe her when she says she was abused. There probably is no way to out on top when trying to argue about satanic abuse...

To come out on top\*

But there may be a



Text Message



DENSON - 00002

new message Cancel

To: Ryan McKnight

greater the claim the greater the threshold of evidence...but I will never shy away from being wrong...especially about this

Ryan ... I don't want to believe it. But now I've seen too much. It's true ... the entire world will want evidence

I know ... but it's the

Text Message

new message Cancel

To: Ryan McKnight

To come out on top\*

But there may be a way to actually get the proof ...

Well, you know I am always open minded

They're not behaving like adults anyway.

And of course the greater the claim the greater the threshold of evidence but I will

Text Message



new message Cancel

To: Ryan McKnight

will want evidence

I know ... but it's the worst trauma I've ever heard of.

Sure. It would be horrible if true. And if there is proof, it will speak for itself. It would be impossible to carry out such a thing for so long without leaving proof beyond victim statements

Text Message

new message Cancel

To: Ryan McKnight

We want to talk to Gerri Gentry and get a declaration. That way she won't be deposed and need to attend a deposition or testify. If we get the declaration and file it it should protect her. Please let her know.

I will

Thank you. I'm worried about the way she'll be

Text Message

DENSON - 00004

new message

new message

To: Ryan McKnight

To: Ryan McKnight

Fri, Nov 9, 7:52 AM

Can you talk real quick?

Yes

Fri, Nov 9, 9:13 AM

Not allowed to record

K

Tue, Nov 27, 8:18 PM

Everything ok? A



Text Message



I will

Thank you. I'm worried about the way she'll be treated by the church attorneys. They're vile creatures. Craig wants her information and wants to protect her.

Sun, Oct 28, 8:45 PM

I'll call in a bit. At a hockey game



Text Message



new message Cancel

To: Ryan McKnight

They may become co plaintiffs or sue on their own

Is Gerry Gentry one of them?



No. Haven't found her

So she is a fourth

Interesting

No a 6th



new message Cancel

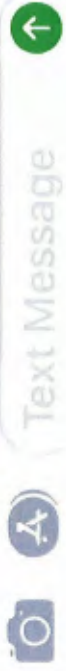
To: Ryan McKnight

No a 6th

Oh?

There are 2 in Argentina. As soon as I have enough in the Go Fund Me my attorney & I are headed that way. If our case is dismissed we appeal to a higher court

I'd like to get it out of Utah





new message Cancel

To: Ryan McKnight

No. He took it under advisement. He leaned in our favor though

Nice. So is it just a waiting game for him to decide or do you move forward with other parts of the process?

We wait

Mon, Jul 23, 12:55 PM

Any new



Text Message

new message Cancel

To: Ryan McKnight

I'd like to get it out of Utah

Tue, Jun 26, 4:14 PM

Gotcha

Wed, Jul 18, 12:16 PM

Did the judge make any descisions today?

Wed, Jul 18, 1:57 PM

No. He took it under advisement. He leaned



Text Message



new message Cancel

To: Ryan McKnight



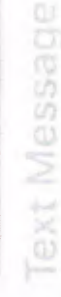

Thu, Aug 9, 12:07 PM

Any news from Geri Gentry?

Mon, Aug 13, 11:35 AM

Judge Kimball ruled. Our fraud claim against the Church survives. Other claims dismissed. As we suspected.

Mon, Aug 13, 1:05 PM

new message Cancel

To: Ryan McKnight

Mon, Jul 23, 12:55 PM





Any new conversations?

Mon, Jul 23, 6:16 PM

No new info yet.

Fyi, our first presentation is going to be thursday at 2pm

It will basically be an

**new message** Cancel

To: Ryan McKnight

No

🙄

Do you think she'll talk to me?

I will try and ask

Joseph Bishop isn't part of the case anymore. I'd like to just hug her ....

✓ 📷 🗨️ ↗️

Text Message

**new message** Cancel

To: Ryan McKnight

Mon, Aug 13, 1:05 PM

Cool. Not complete bad news

Mon, Aug 13, 5:53 PM

Any news from Geri Gentry?

Mon, Aug 13, 7:21 PM

No

🙄 📷 🗨️ ↗️

Text Message

new message

Cancel

To: Ryan McKnight

Tue, Aug 14, 12:44 PM

4:43P CH  
Alex Monson  
You and Alex aren't connected on WhatsApp.  
Click on the name, then  
Add (or remove Alex) from your contact list.  
Add (or remove Alex) from your contact list.  
Add (or remove Alex) from your contact list.

You're a crazy  
bitch!!! Quit trying  
to make the church  
look bad.

Statute of limitations  
bitch

Thank you Alex

Would you care to comment  
on why you sent that  
message?

Alex Monson accepted your request

Because women these days  
play the victim 25 years later  
just to get why its coming  
out now.

Text Message

new message

To: Ryan McKnight

Because women these days  
play the victim 25 years later  
just to get why its coming  
out now.

There are three images  
in this picture that you don't  
want to see. The first is a  
picture of a woman who is  
a victim of sexual assault.  
The second is a picture of  
a woman who is a victim of  
sexual assault. The third is  
a picture of a woman who is  
a victim of sexual assault.

Text Message

new message Cancel

To: Ryan McKnight

Sine has stopped responding to me

I am giving her some space

Thank you. I totally understand.

Sun, Sep 2, 9:37 AM

Let me know how it goes. I also super curious to know if he is in attendance.



new message Cancel

To: Ryan McKnight

curious to know if he is in attendance.

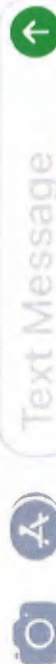
Roger that

Sun, Sep 2, 7:26 PM

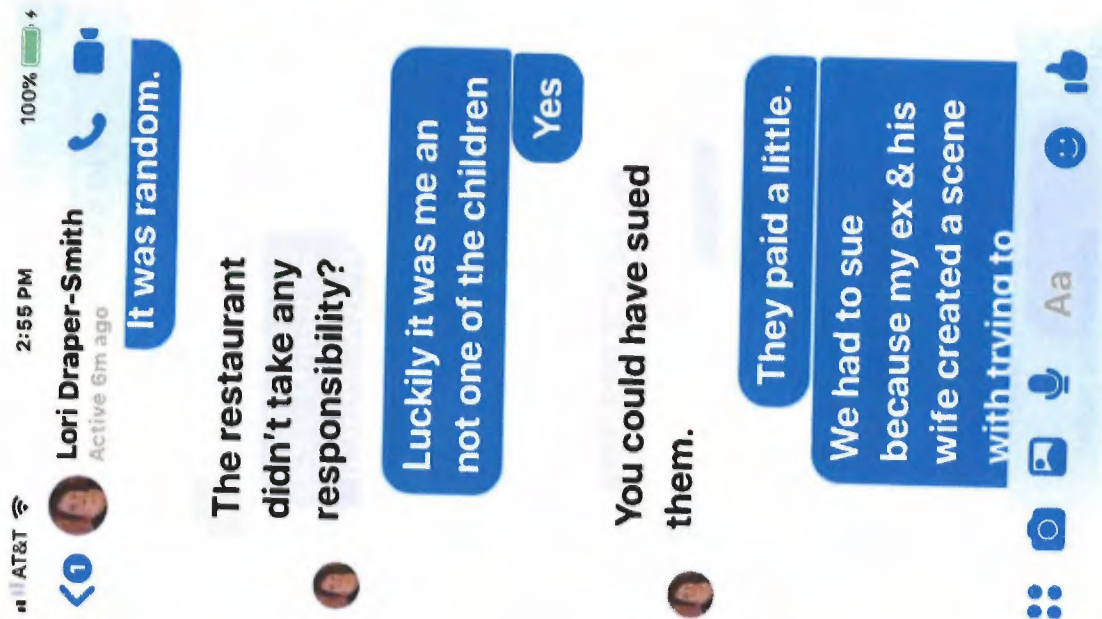
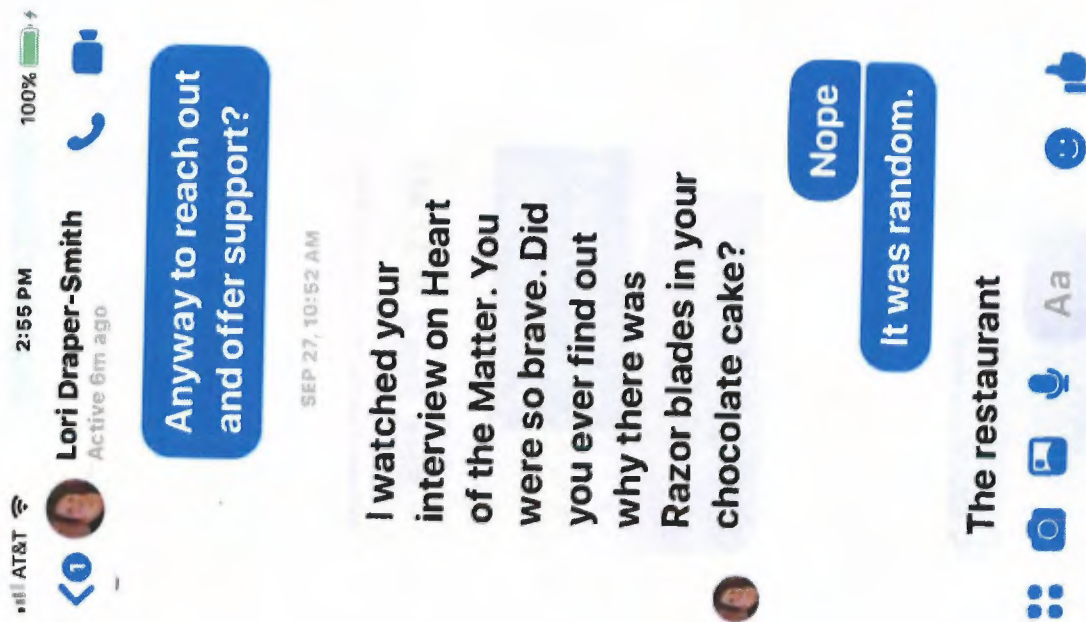
He was there. It was EPIC !!! So much audio & video it'll be tomorrow before we can release

Wow.

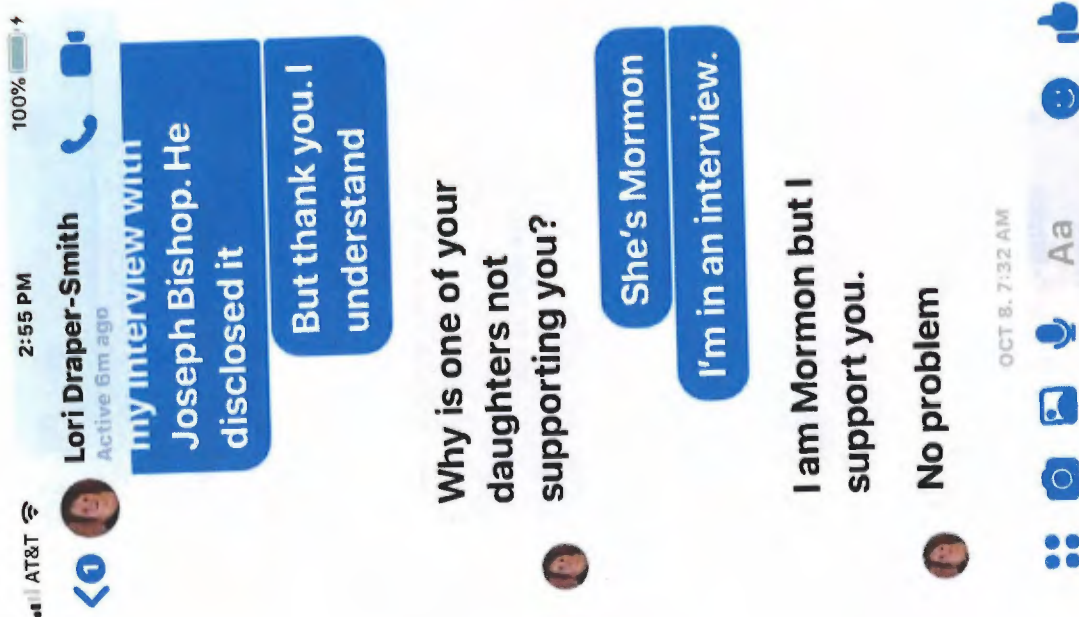
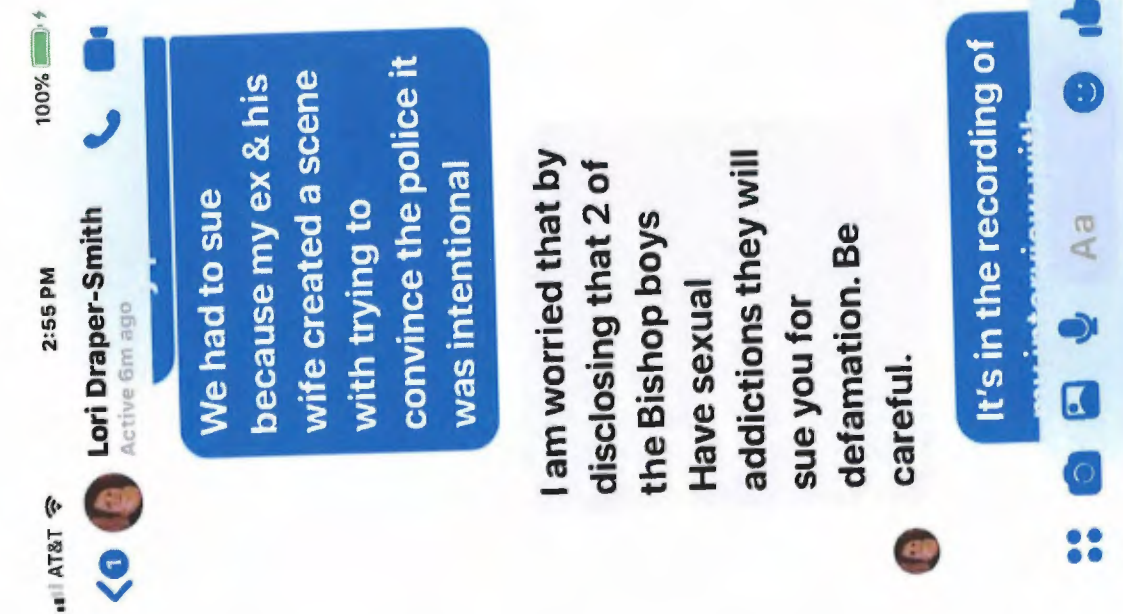
Mon Sep 3 12:53 PM

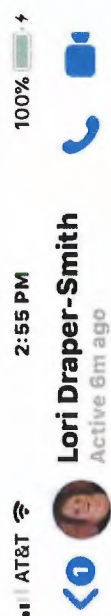












OCT 11, 11:02 AM

## Were you ever able to find Carol?

OCT 11, 11:18 AM

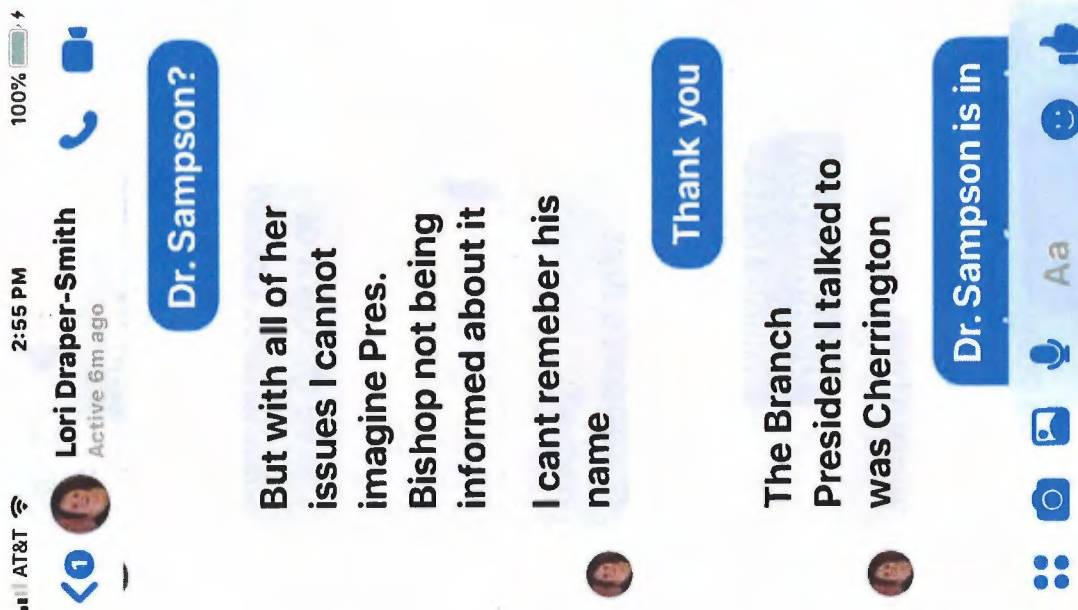
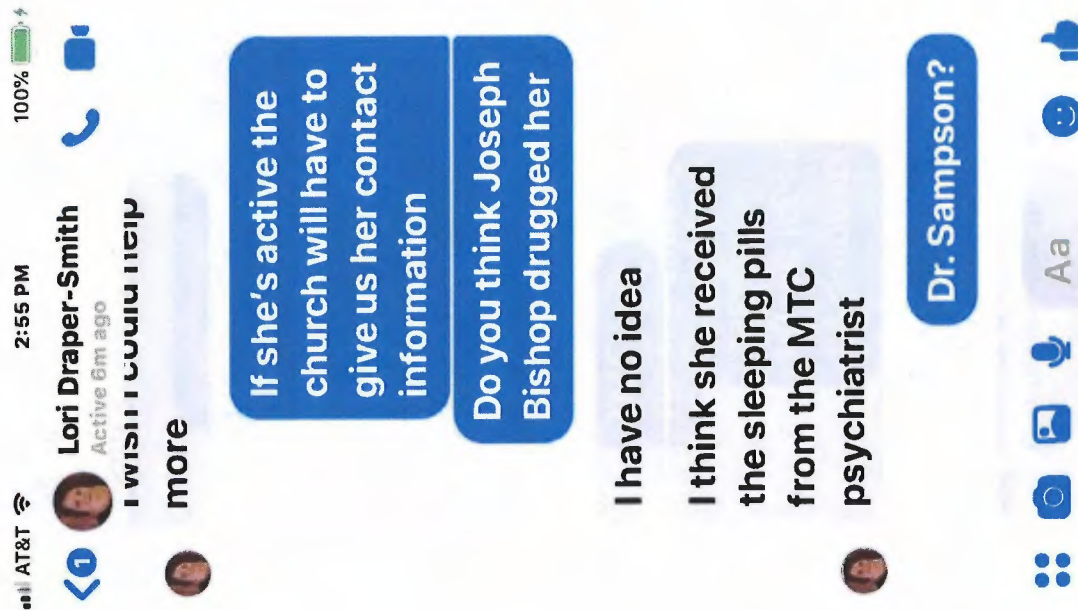
No

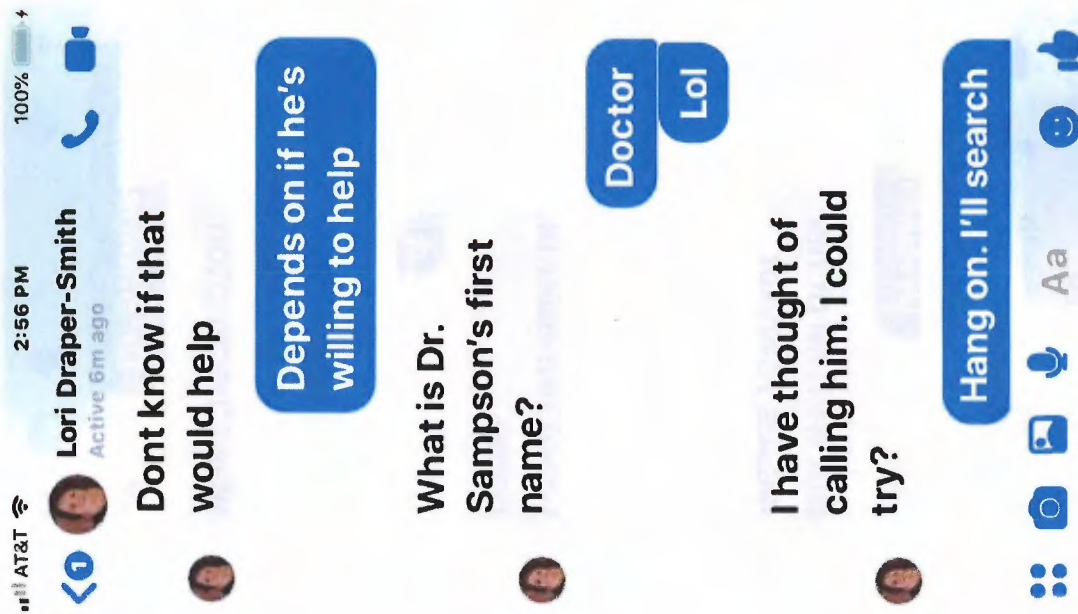
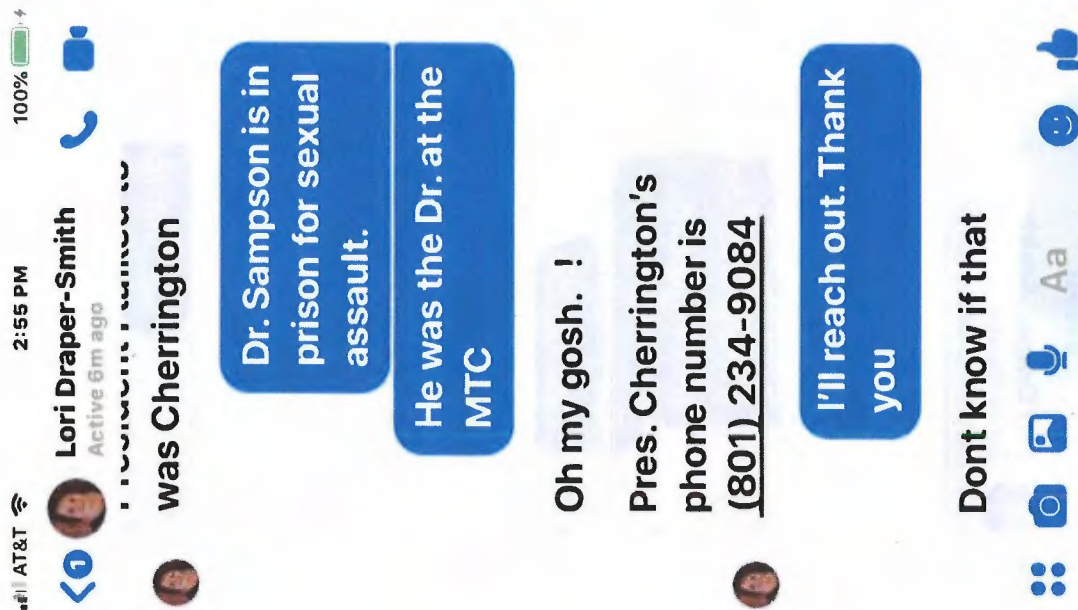
## Still looking

**Dang**

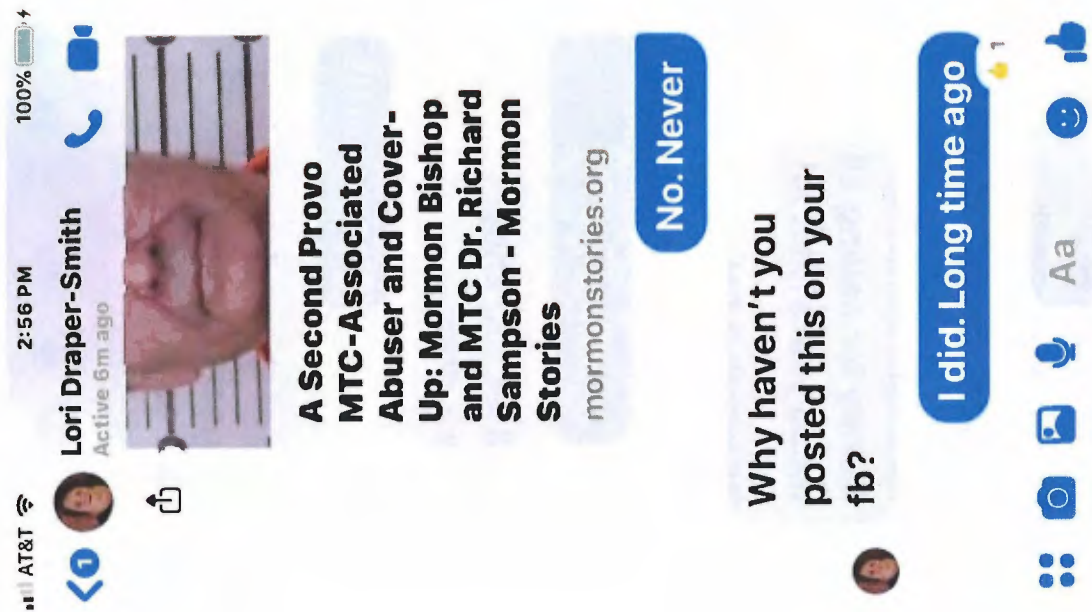
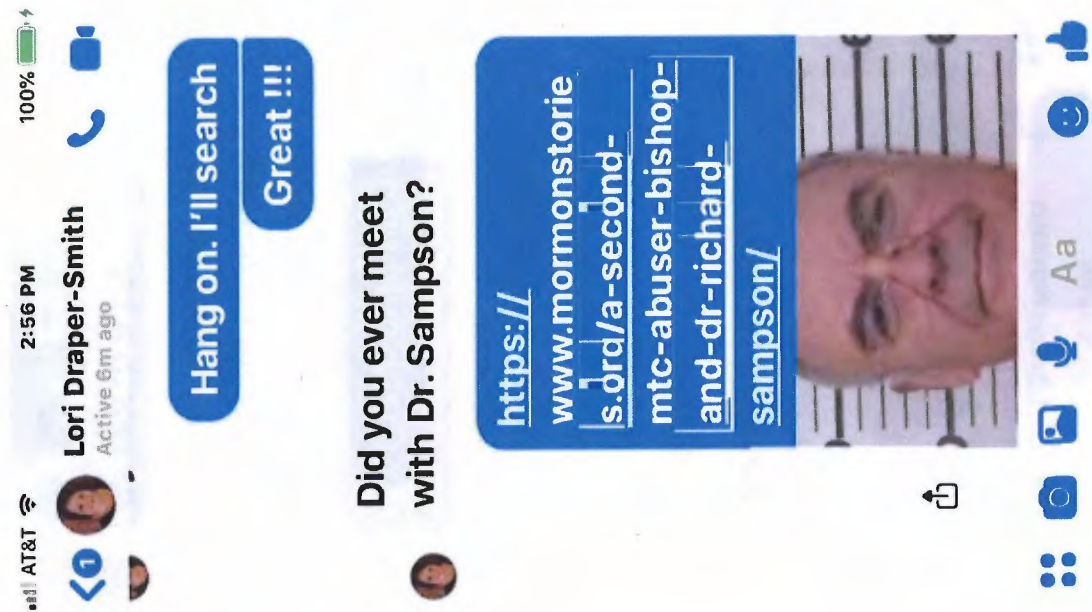
**I wish i could help  
more**



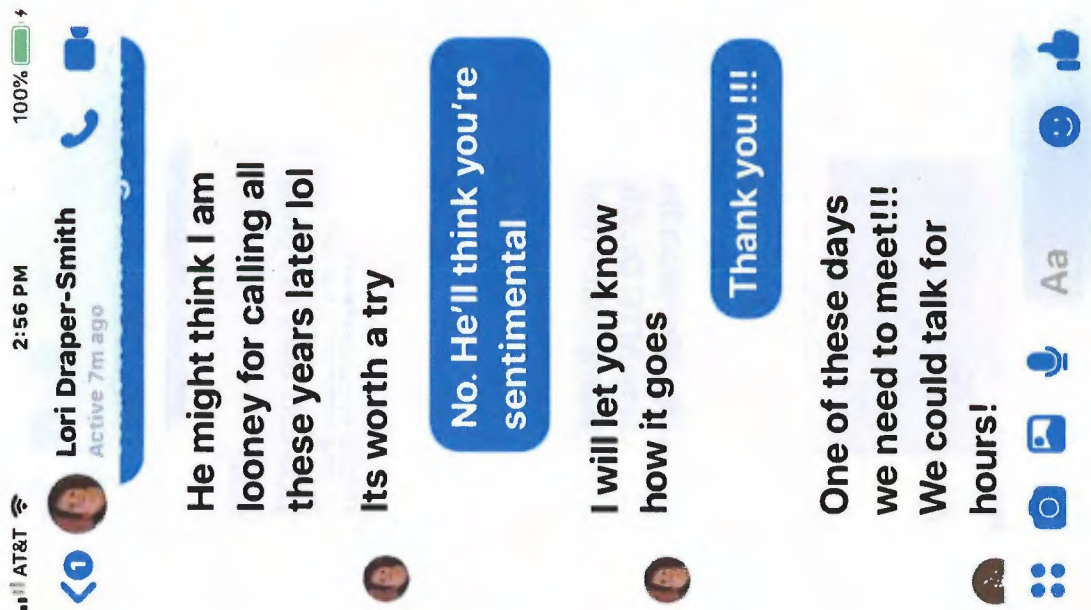
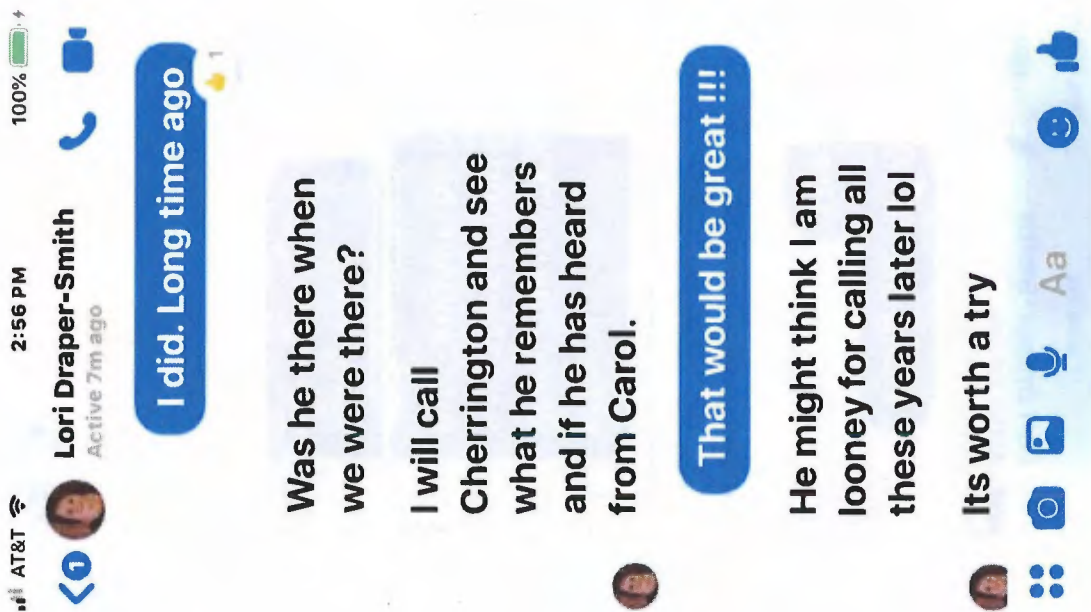












AT&T 100% 2:56 PM Lori Draper-Smith Active 7m ago

< 1

One of these days we need to meet!!! We could talk for hours!

I know !!!

OCT 11, 12:50 PM

I got a hold of him. Can I call you?

Call Ended 45 secs

Lori called you.

Call Again

719-722-1091

OCT 11, 4:30 PM

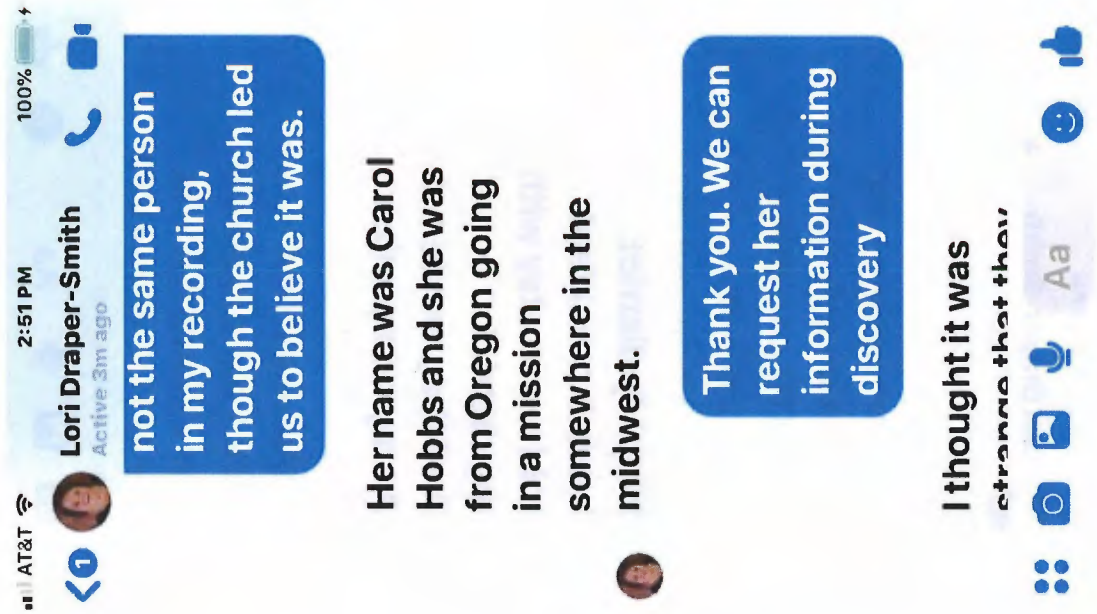
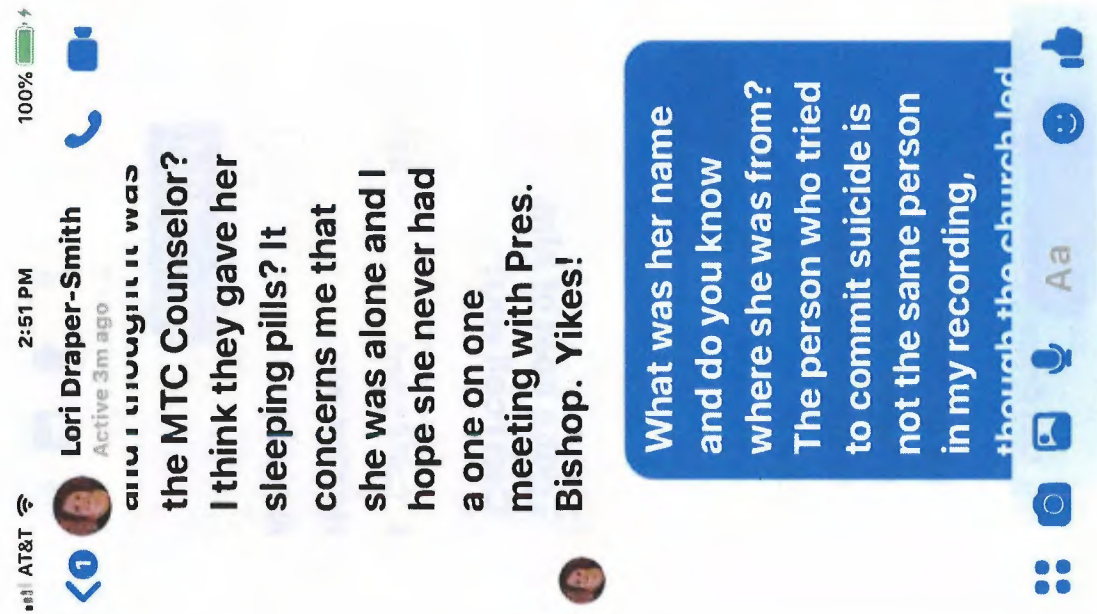
AT&T 100% 2:51 PM Lori Draper-Smith Active 3m ago

< 1

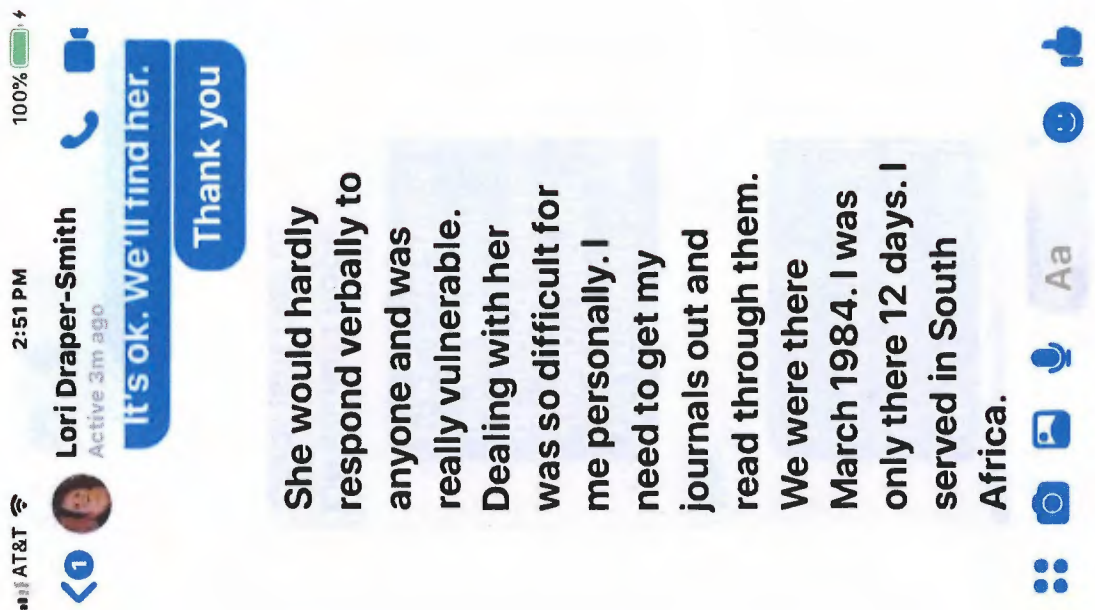
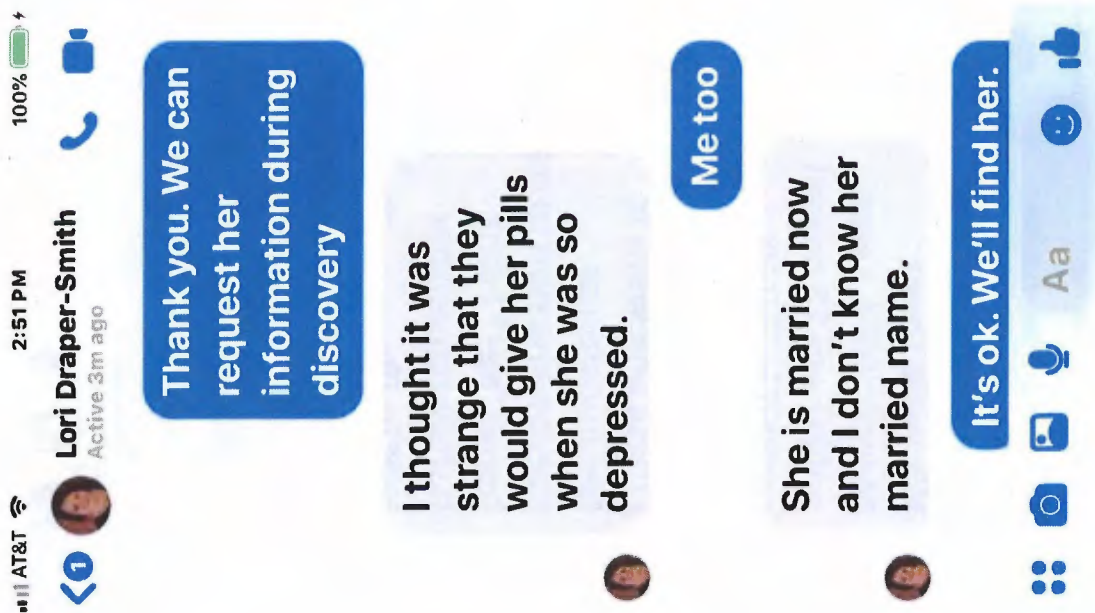
AUG 15, 7:58 AM

My companion had severe depression in the MTC and there were days she couldn't get out of bed. My district branch president told me to stay with my district And they would act As my companion. She talked to someone there about her problems and I thought it was the MTC Counselor?

DENSON - 00019







AT&T 2:51 PM 100%

**Lori Draper-Smith**  
Active 3m ago

<1

read through them.  
We were there  
March 1984. I was  
only there 12 days. I  
served in South  
Africa.

I think she went to  
her mission or  
maybe she had to go  
home first? I can  
hardly remember  
anymore.

May I say something  
that is top secret for  
now? And you'll keep  
it private?

📷 📧 📺 🗨️ 😊 👍

AT&T 2:51 PM 100%

**Lori Draper-Smith**  
Active 3m ago

<1

May I say something  
that is top secret for  
now? And you'll keep  
it private?

Yes

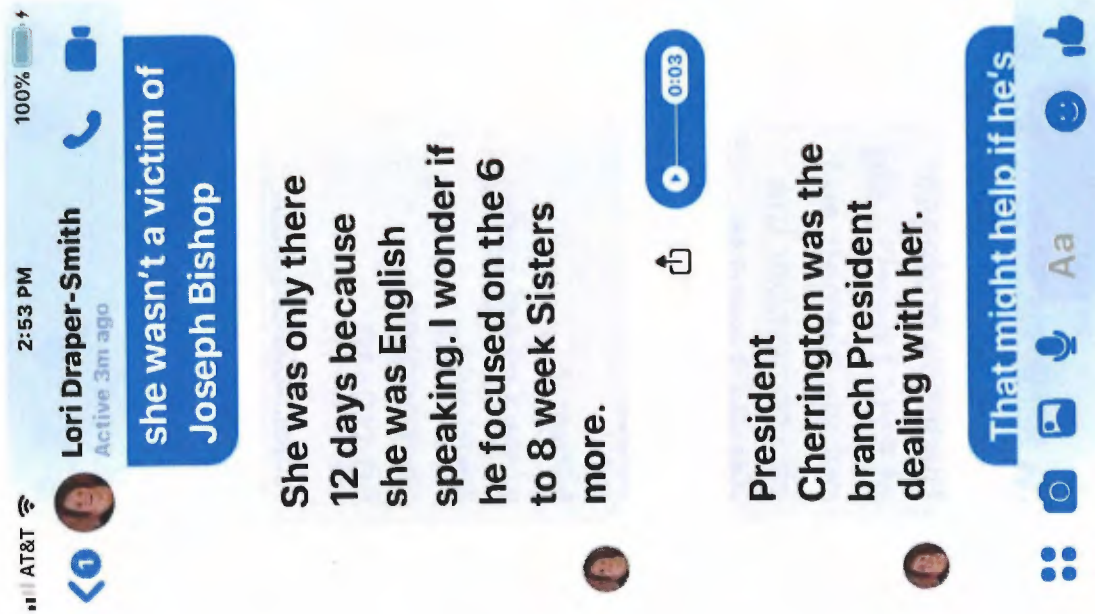
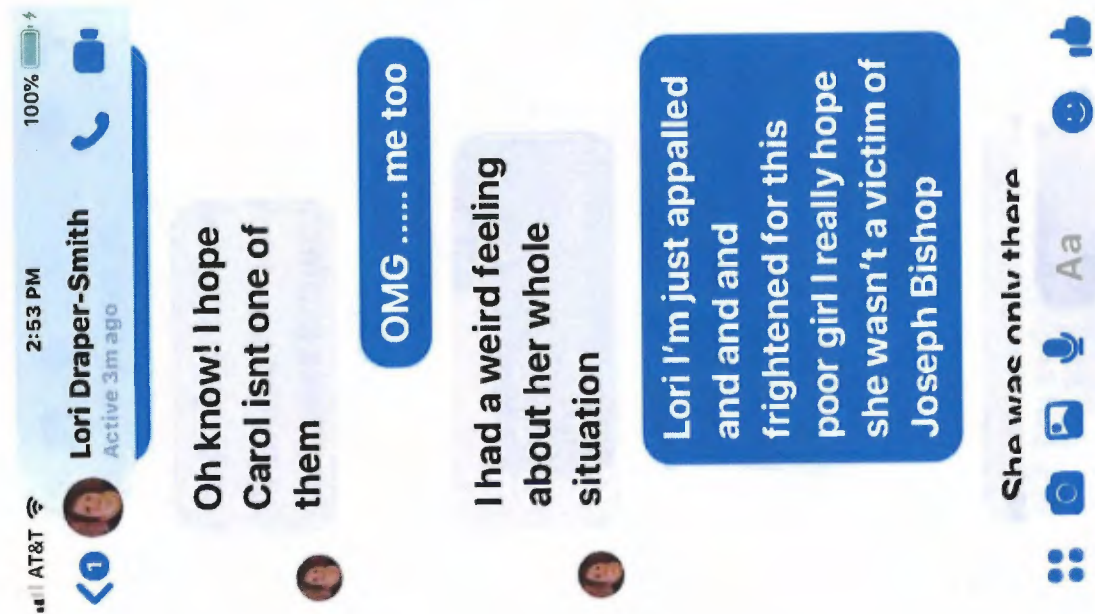
We know of 2 women  
Joseph Bishop  
drugged and raped  
while Mission  
President at the MTC

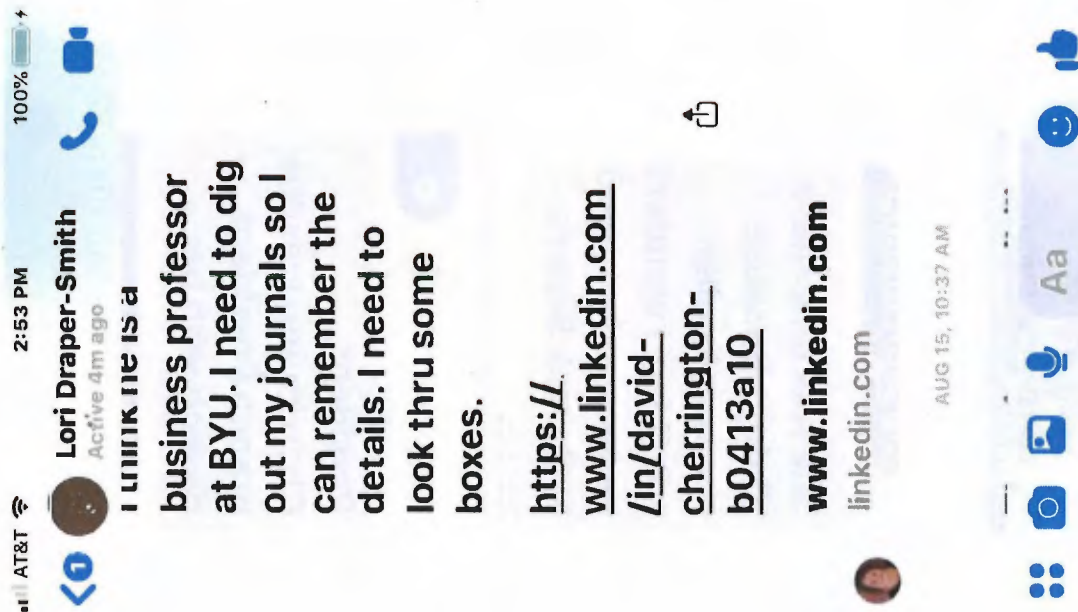
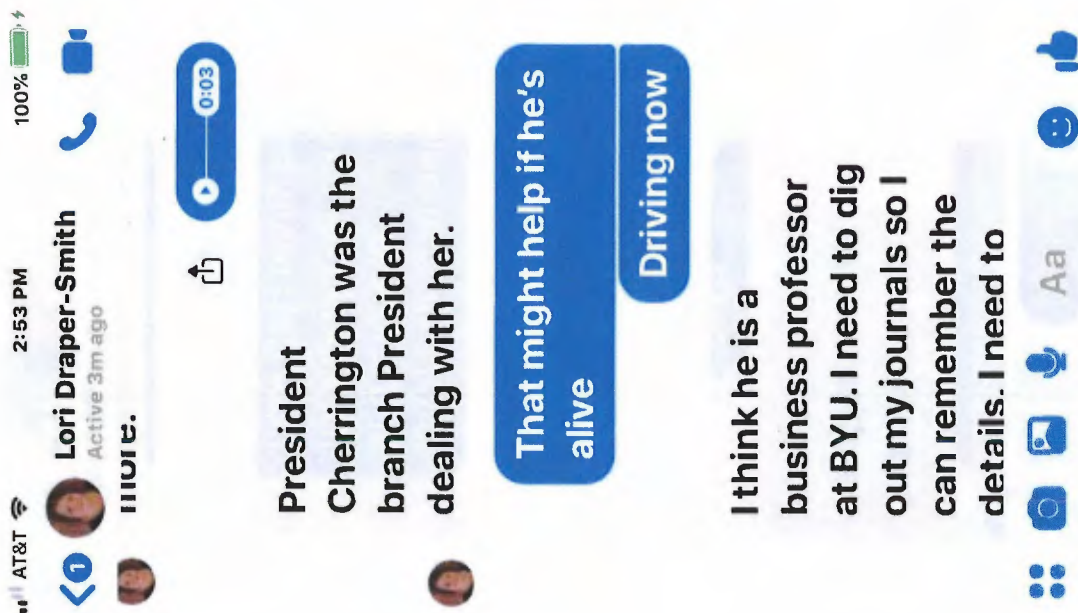
Oh know! I hope  
Carol isnt one of  
them

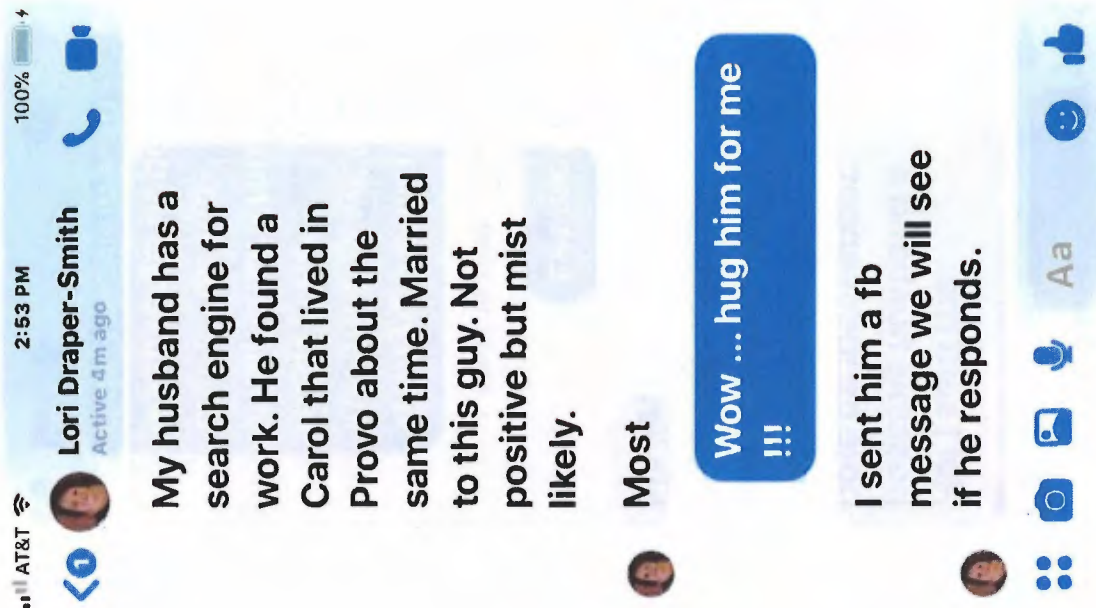
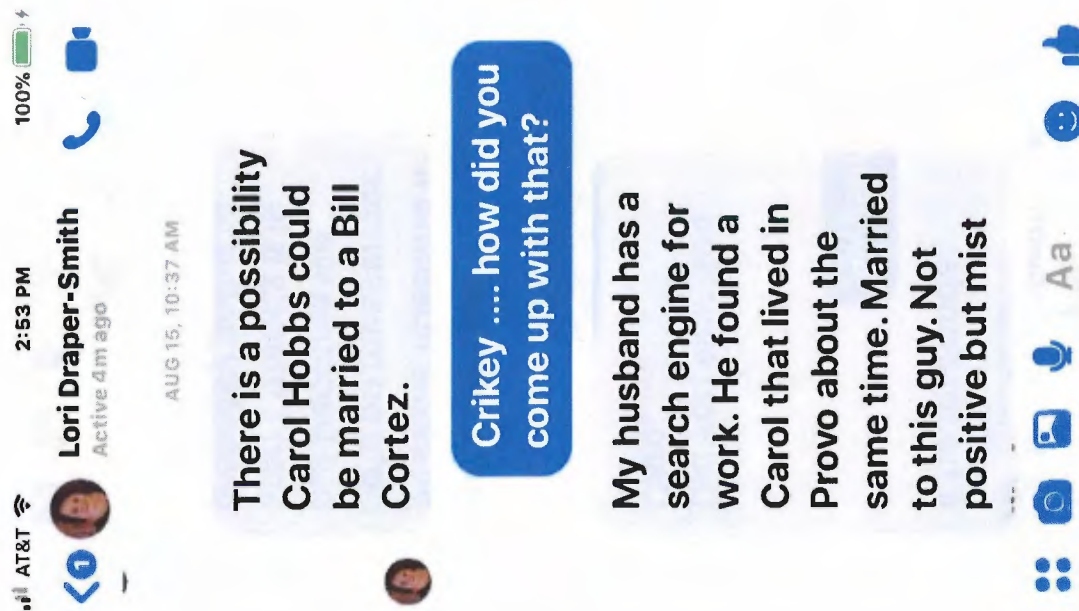
OMG ..... me too

📷 📧 📺 🗨️ 😊 👍

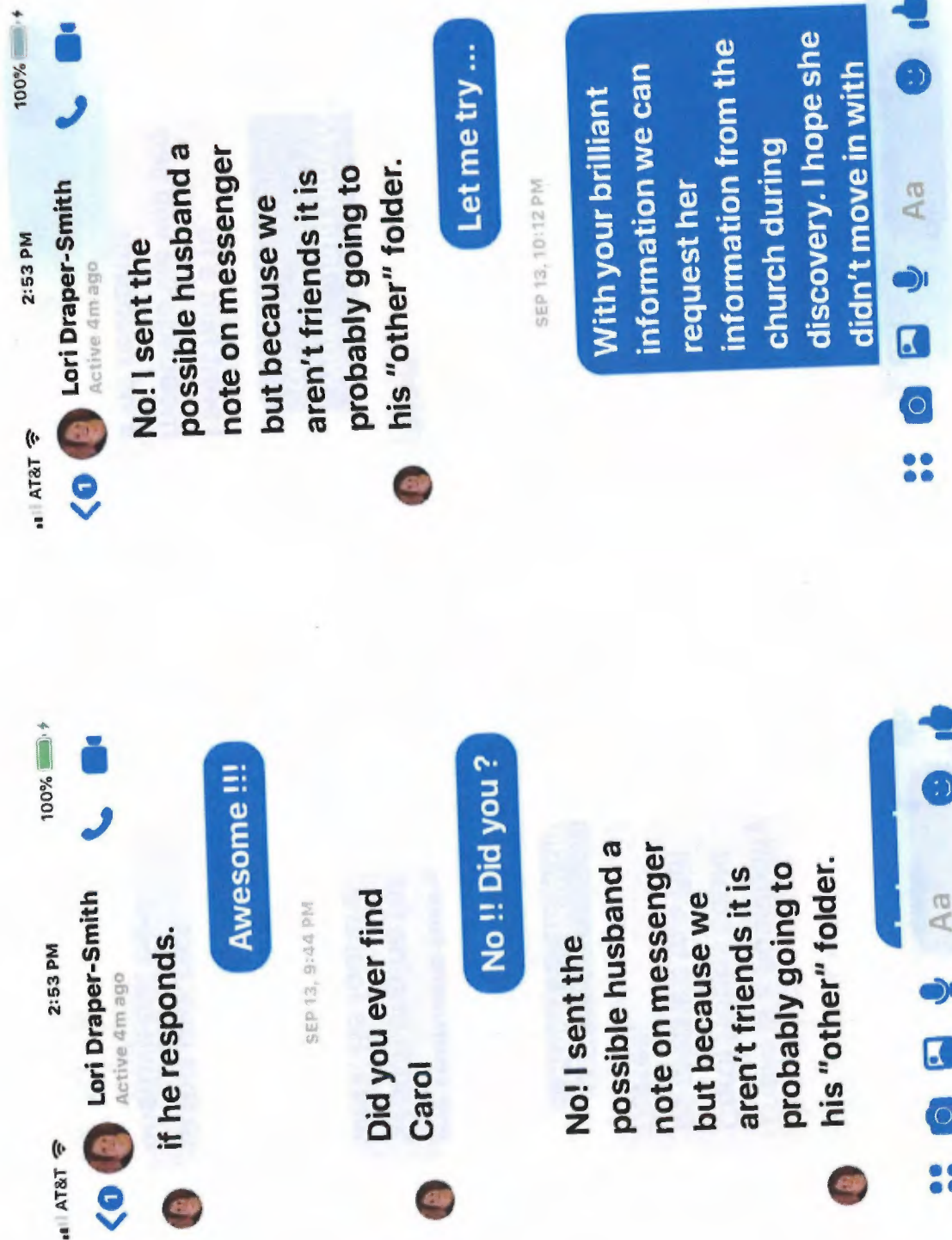


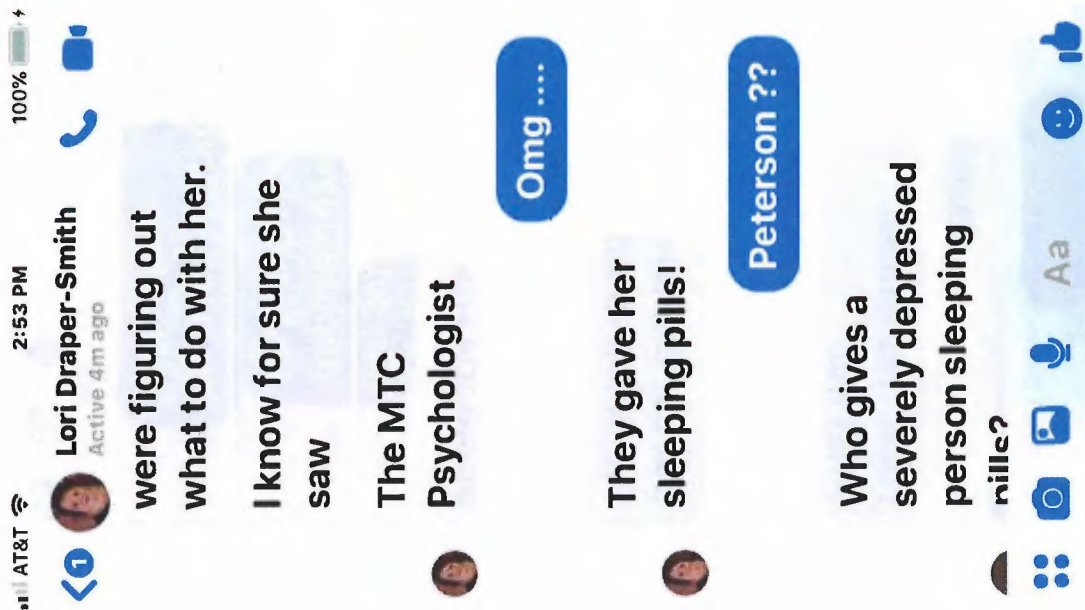
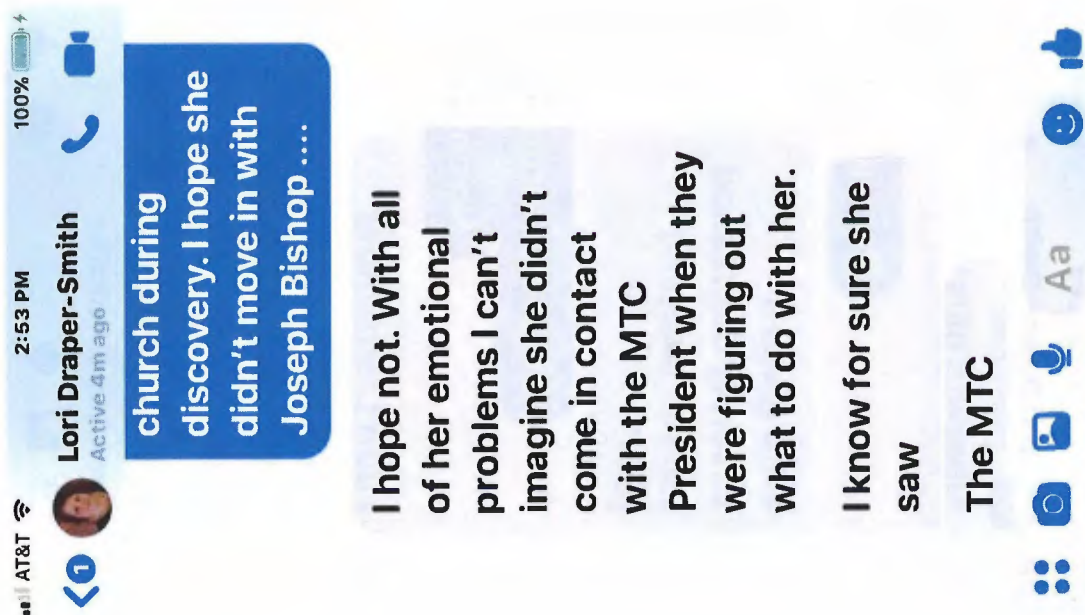




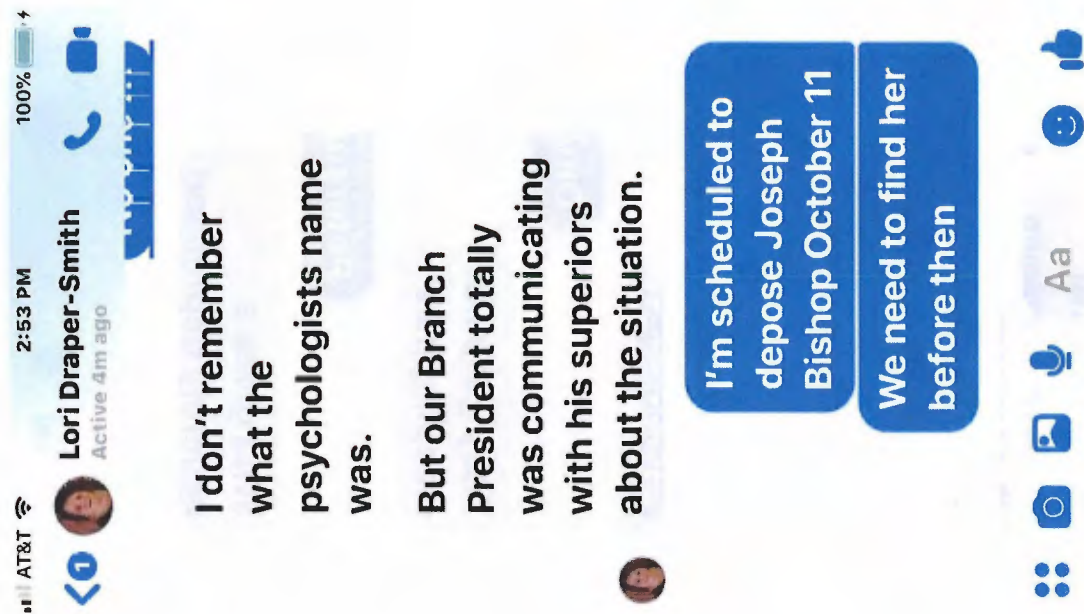
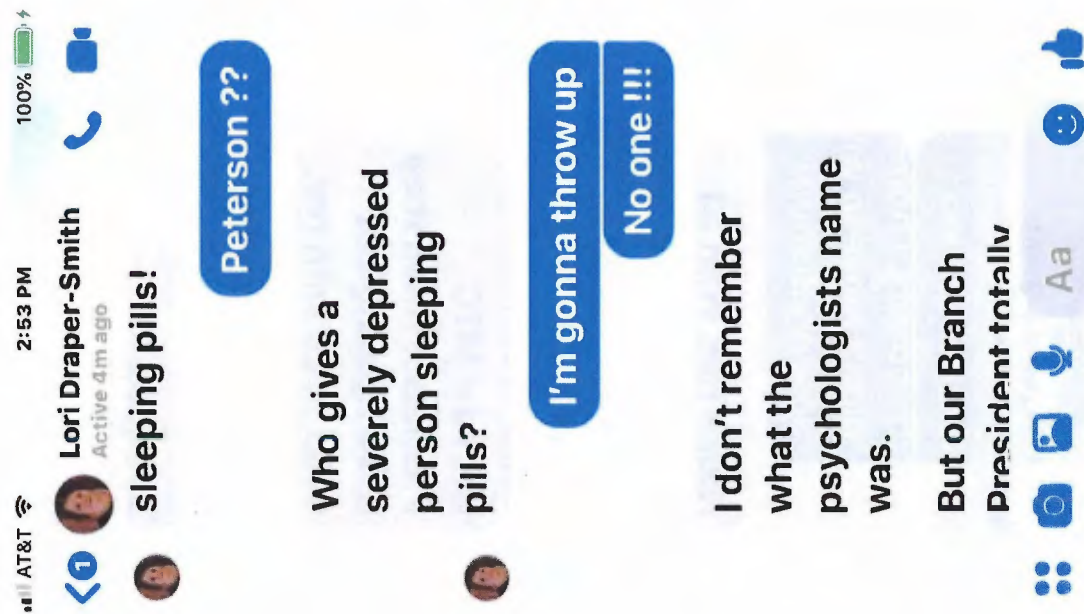


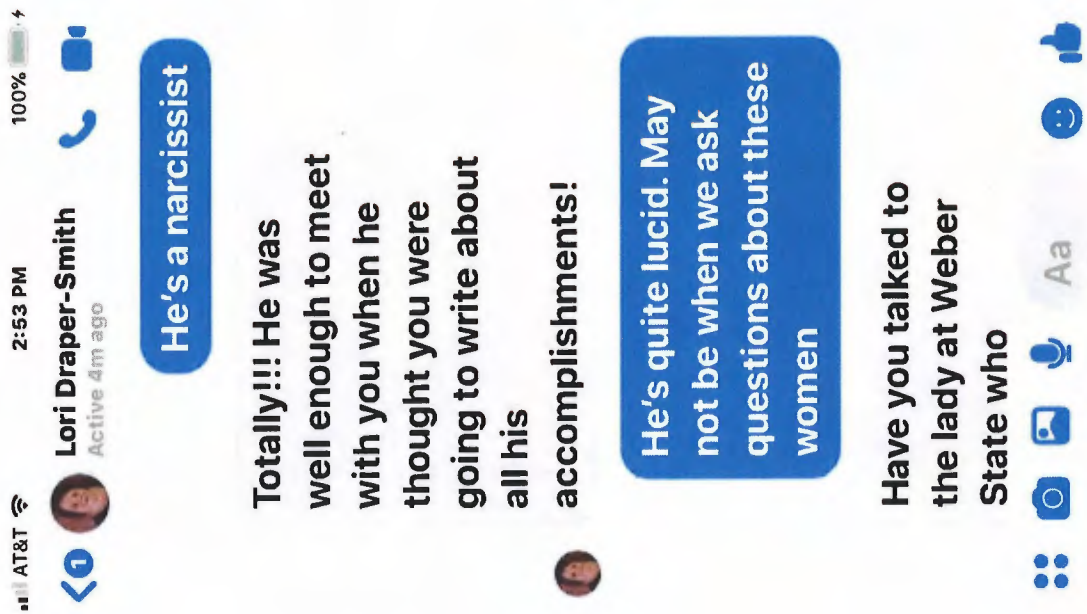
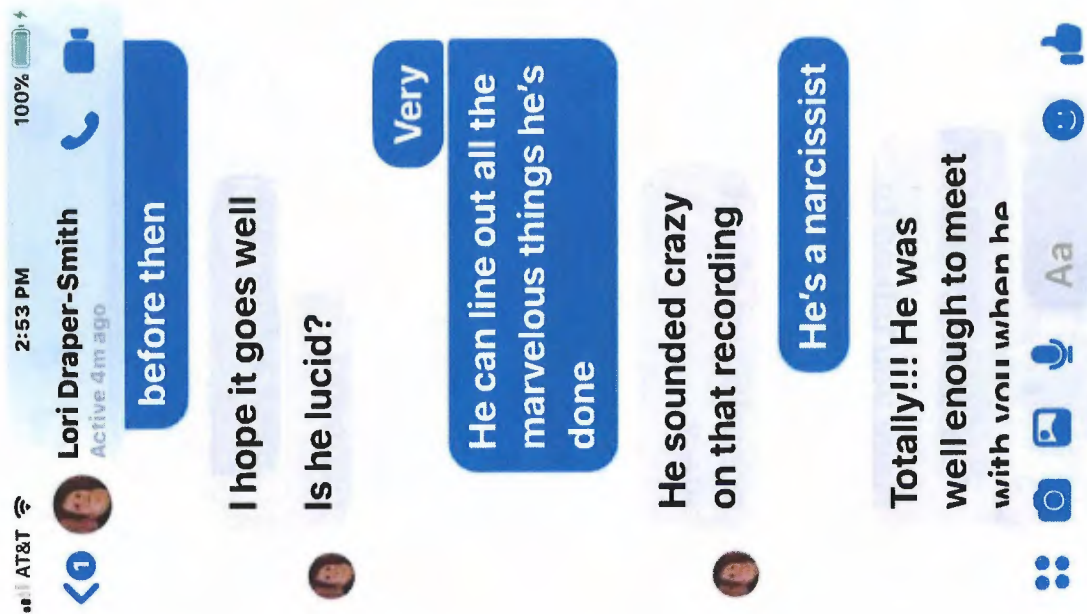


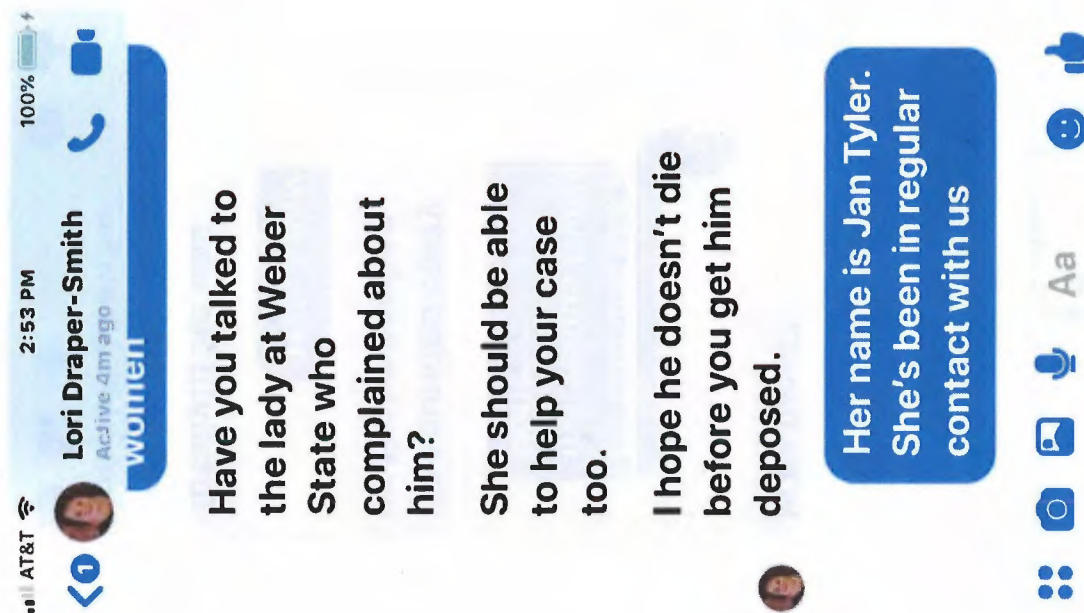


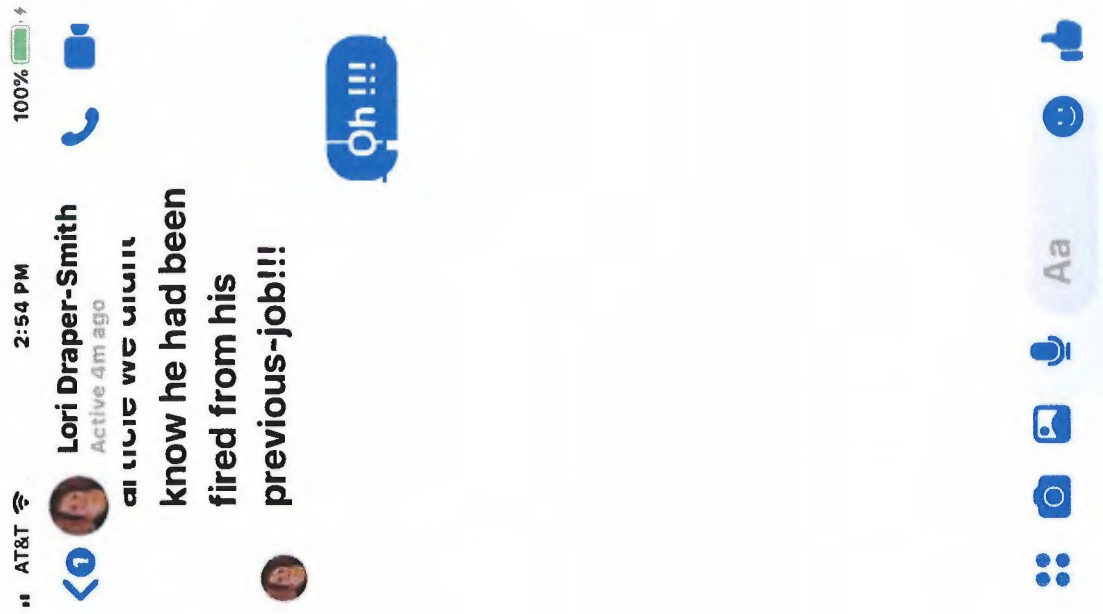




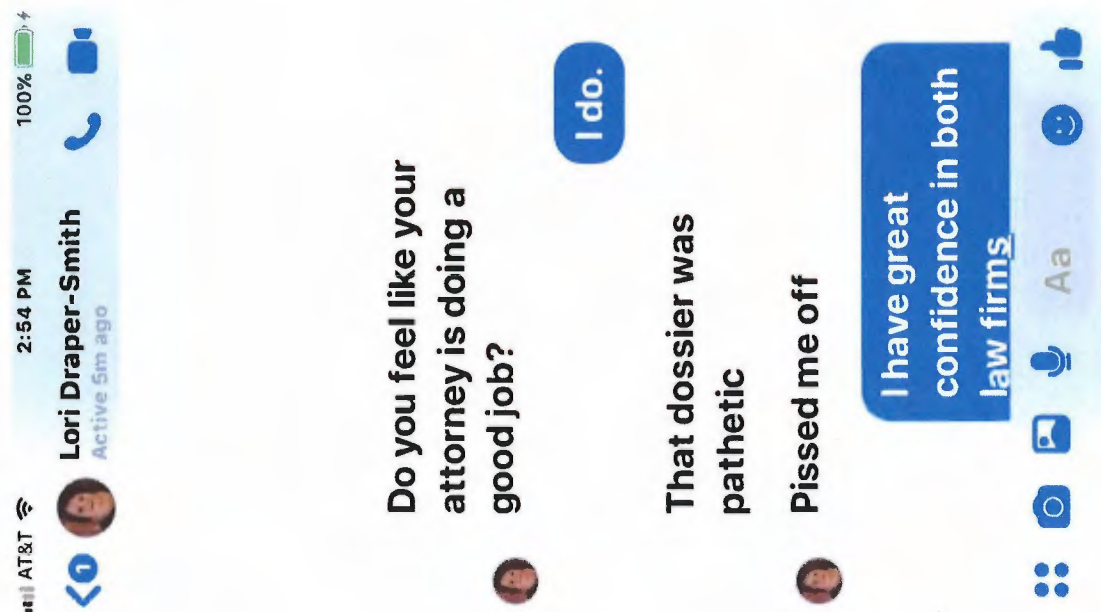


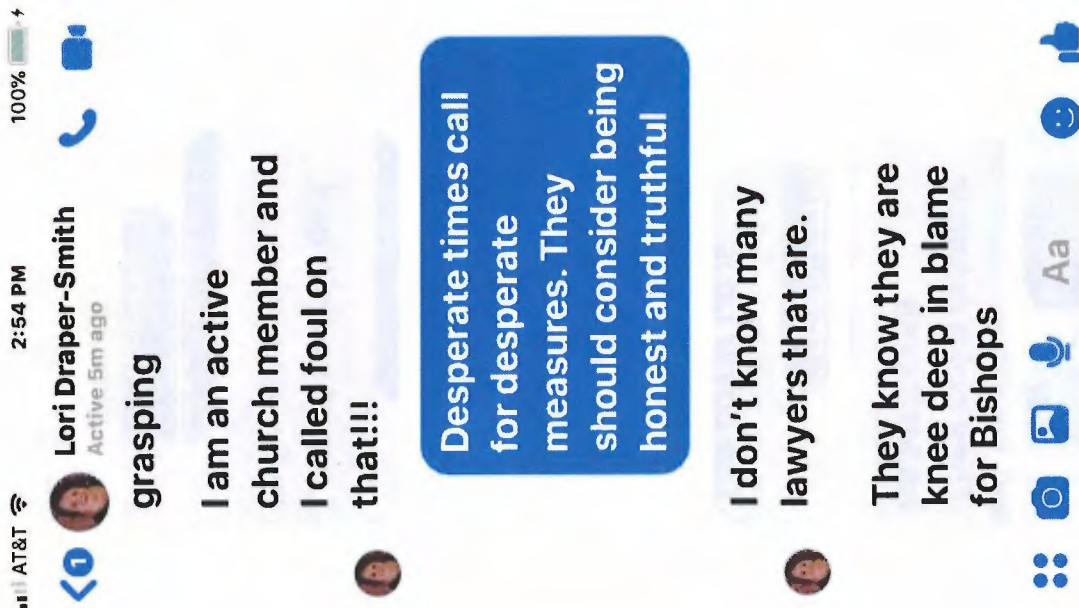


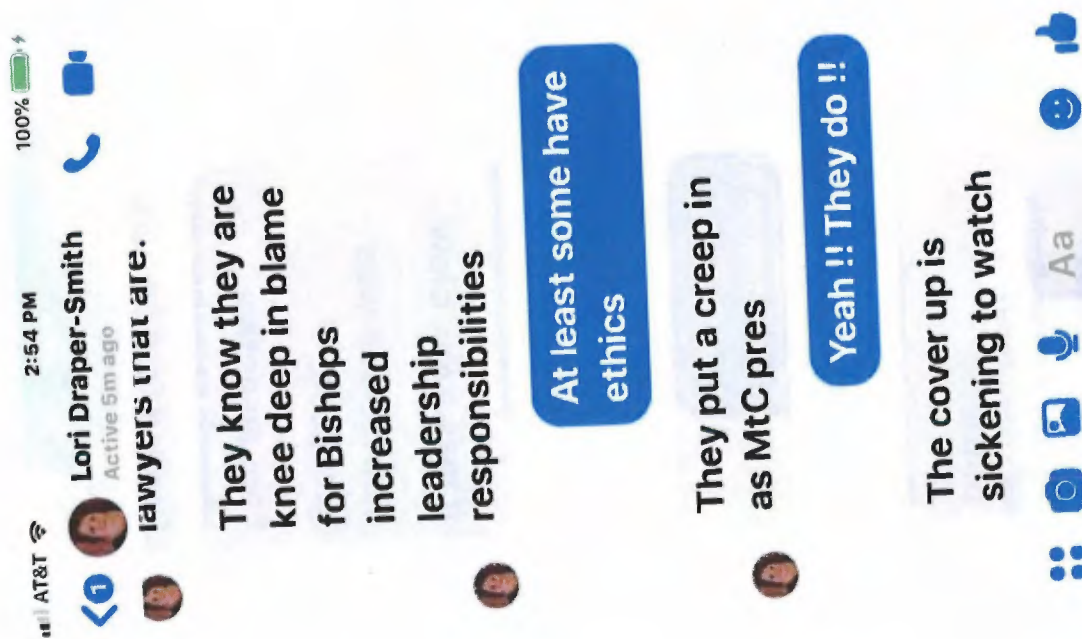
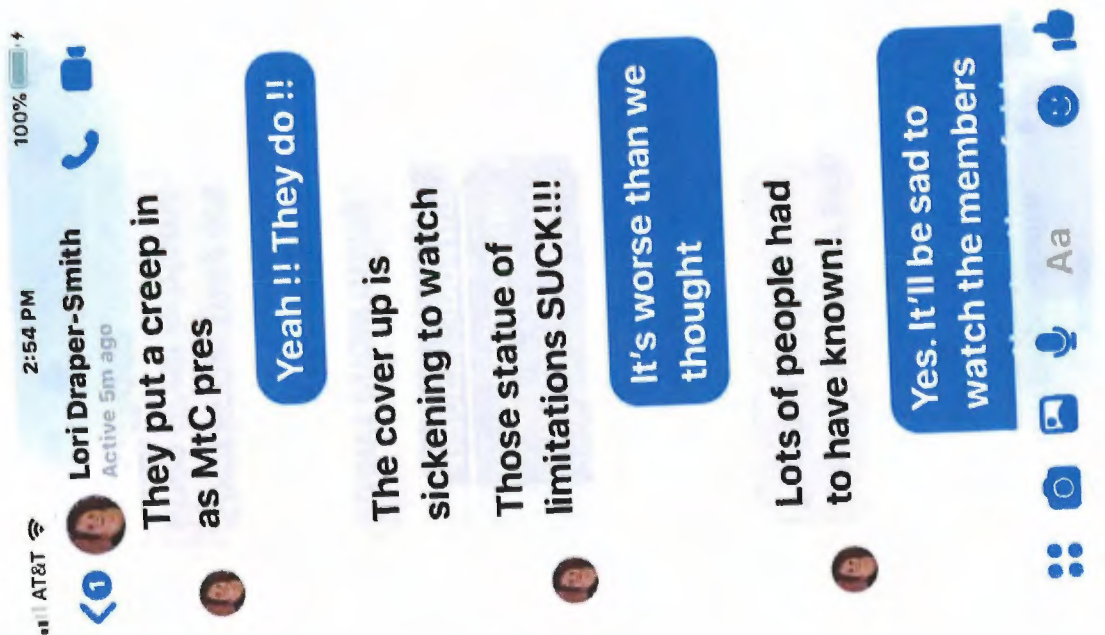


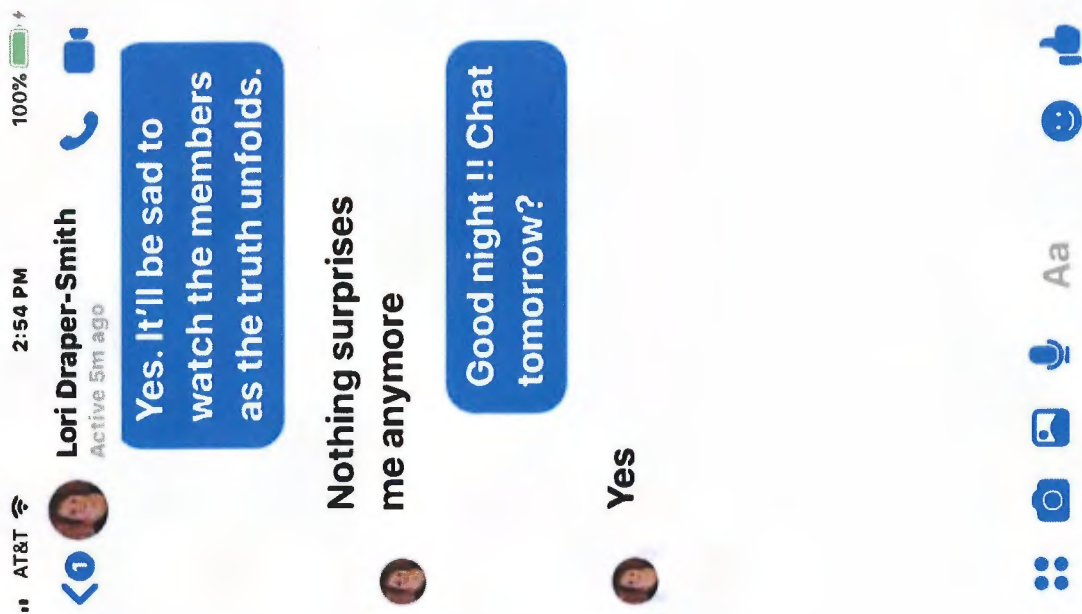














**EXHIBITE**  
(Video clip - Filed  
Conventionally)